

ATTACHMENT G

Hazardous Waste Training Plan

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1. Hazardous Waste Training Plan

1.1 INTRODUCTION

The Hazardous Waste Training Plan (Plan) training program has been developed to comply with the requirements of Title 40 CFR 264.16, as well as OSHA worker training requirements identified in 29 CFR 1910.120. Qualified Company trainers or outside training companies are used to provide Hazardous Waste Operation (HAZWOPER) training. In addition, the Facility provides in-house training programs and on-the-job training pertaining to equipment operations and safety.

This Plan is designed to familiarize employees involved in hazardous waste management with Arizona and Federal hazardous waste regulations, proper hazardous waste management procedures, and safety hazards and precautions. The Plan is designed to ensure that Facility personnel can respond effectively to emergency situations, as established by the Contingency Plan.

1.2 OVERVIEW OF THE TRAINING PROGRAM

1.2.1 Organization of the Modules

The Training Plan includes specific topic modules. These modules are outlined in [Section 3](#). The training modules address the following subject areas:

- A.** Intent of the Training Plan
- B.** Corporate and Individual Responsibilities and Liabilities
- C.** Operations Involving Hazardous Waste at the Facility
- D.** Waste Identification
- E.** Chemical Hazards
- F.** Biological Hazards
- G.** Waste Handling
- H.** De-Valving Cylinders
- I.** Waste Acceptance and Analysis Practices
- J.** Waste Storage and Treatment Practices
- K.** Self-Inspection Requirements
- L.** Emergency Procedures
- M.** Emergency Equipment
- N.** Emergency Coordinator Duties
- O.** Waste Shipment Requirements
- P.** Reporting and Recordkeeping

1.2.2 Training System

The Training Plan is divided into two categories: 1) Annual Classroom Training; and 2) On-the-Job Training Related to the Position. **Table G-1** provides a list of training modules to be completed for each job title/category listed in **Sections 6 and 7**.

Classroom training is conducted annually by either qualified Triumvirate personnel, or by third party qualified contractors. All employees involved in hazardous waste management receive annual training. This training is in the form of lecture presentations and covers the modules indicated in **Table G-2**.

Sufficient time is provided throughout the classroom presentations to allow for questions from the attendees. The annual classroom training is supplemented by in-house classroom and by on-the-job training conducted by appropriate supervisory personnel, who will have received training from the General Manager or Facility Manager or other qualified trainers. This on-the-job training will address the individual's position, duties and responsibilities involving hazardous waste management. Both the classroom and the on-the-job training is documented in each person's training records.

1.2.3 New Employees and Reassignments

New personnel will not work in an unsupervised capacity until they have completed the training required for their position. Employees who handle hazardous waste and who are expected to respond to a hazardous waste incident must have introductory training prior to starting their particular job function. Facility personnel will successfully complete applicable training within six months from the date of their employment or upon being assigned to a new position at the Facility. Training requirements range from 24 to 40 hours depending on the job category of the individual. In accordance with applicable requirements of 29 CFR 1910.120 (e) (3) and (4), occasional site workers are required to complete a 24-hour hazardous waste training program. The completion of a 40-hour hazardous waste training program is required for employees involved in daily hazardous waste activities and that may require the use of respiratory protection.

1.2.4 Annual Review

All personnel involved with hazardous waste will take part in an 8-hour annual review of their initial training. The program will include a review of the existing training plan and review updates of applicable regulations. A review of hazardous materials handling practices, worksite safety, personal protective equipment, health effects and medical surveillance, review of chemical hazards and toxicology and modifications to the Facility and its operations. Training records will include the following information about each employee:

1. Name,
2. Position,
3. Job description emphasizing hazardous waste related duties,
4. Qualifications,

5. Description of required training and records of all hazardous waste related training completed by the employee.

2. Designation of Training Modules Specific to Job Categories

Table G-1 provides a list of training modules to be completed for each job title/category listed in **Sections 6 and 7**. The training modules listed in **Table F-1** correspond to the modules identified in **Table G-2**.

TABLE G-1
Job Titles and Assigned Training Modules

| Job Title | Training Module(s) to be Completed |
|-----------------------------|------------------------------------|
| General Manager | All Modules |
| Facility Manager | All Modules |
| Technical Waste Coordinator | All Modules |
| Warehouse Manager | All modules |
| Facility Chemist | All Modules |
| Compliance Assistant | A, B, E-H, K, O |
| Warehouse Technician | All Modules |

3. Outline of Training Modules Content

The Facility's training modules are separated into distinct modules. The content of each module Outlined in **Table G-2**.

TABLE G-2 Training Module Content

| Module | | Description | Application | |
|----------|--|--|-------------|---------------------------------|
| | | | Classroom | OTJ (On-the-Job Training) |
| A | Intent of the Training Plan | -Purpose -Content -Annual Review | ✓ | |
| B | Corporate and Individual Responsibilities and Liabilities | | ✓ | |
| C | Facility Operations | -Storage & Treatment Facility -Regulatory Status | ✓ | |
| D | Waste Identification | -Hazardous Waste Identification System -US EPA Hazardous Waste -Waste Acceptance at the Facility | ✓ | |

TABLE G-2 Training Module Content

| Module | Description | Application | |
|----------|---|-------------|---------------------------------|
| | | Classroom | OTJ (On-the-Job Training) |
| E | Chemical Hazards -Chemical/Physical Properties -Occupational Exposure | ✓ | ✓ |
| F | Biological Hazards -Bloodborne Pathogens -Medical Waste Types / Properties -Medical Waste Packaging -Occupational Exposure | ✓ | |
| G | Waste Handling -Safety Precautions -Safety Equipment -Spill Containment & Cleanup | ✓ | ✓ |
| H | Cylinder De-Valving -Safety Precautions -Safety Equipment -SOP -Record Keeping | ✓ | ✓ |
| I | Waste Acceptance -Waste Analysis -Sampling & Testing Procedures -Rejection of Shipments -Manifest Review and Processing -Manifest Discrepancies | ✓ | ✓ |
| J | Waste Storage & Treatment -Locations at the Facility -Design & Construction of Storage Areas -Storage Operations (containers & tanks) -Treatment Operations -Aisle Space -Waste Segregation | ✓ | ✓ |
| K | Site Inspection Requirements -Loading Unloading Areas -Drum Storage Areas -Inspection Log Entries | ✓ | ✓ |
| L | Emergency Procedures -Contents and Intent of Contingency Plan -Implementation of Contingency Plan -Notification of Procedures -Spill Containment and Cleanup -Evacuation Procedures -Communications -Arrangements with Authorities -Review of Emergency Coordinator's Role | ✓ | ✓ |
| M | Emergency Equipment -Required per 40 CFR 264, Subparts C & D -Available at the Facility -Locations at the Facility | ✓ | |

TABLE G-2 Training Module Content

| Module | | Description | Application | |
|----------|--------------------------------------|--|-------------|---------------------------------|
| | | | Classroom | OTJ (On-the-Job Training) |
| | | -Use of -Inspection of -Replacement/Repair | | |
| N | Emergency Coordinator Duties | -Role/Authority/Knowledge (required) -Responsibilities -Availability -Review of all Aspects of Contingency Plan | ✓ | ✓ |
| O | Waste Shipment Requirements | -Use of DOT Requirements -Proper Manifest Completion -Drum Marking & Labeling | ✓ | ✓ |
| P | Reporting & Recordkeeping | -Spill and Incident Reporting -Hazardous Substances (RQs) -Manifests -Inspections Logs -Waste Analysis Records -Training Records -Correspondences -Record Retention | ✓ | ✓ |

Some of the above training modules are provided by means of either classroom or on-the-job training, or both, while others require strictly classroom type presentations. The Facility will provide hazardous waste training to its personnel in the following manner:

1. At least annually, all personnel involved in the management of hazardous waste will receive formal classroom type presentation conducted by either qualified Triumvirate personnel or by a third party qualified contractor. This session will last a minimum of eight hours and will provide an overview of all relevant training modules.
2. Each employee also is provided supplementary classroom and on-the-job training relevant to his/her position. This on-the-job training may precede the classroom session for new or reassigned employees who must be trained prior to assumption of their duties in unsupervised positions.
3. For key personnel, The Facility may elect to supplement the training outlined in the Plan by attending specialty hazardous waste/materials seminars or programs.

4. Individuals Qualified to Train

The General Manager, the Facility Manager, other employees qualified by education and/or training will carry out supplementary classroom and on-the-job training of all new personnel. These individuals will maintain knowledge of regulations and procedures through self-study, on-the-job experience, and supplemental training (e.g., seminars).

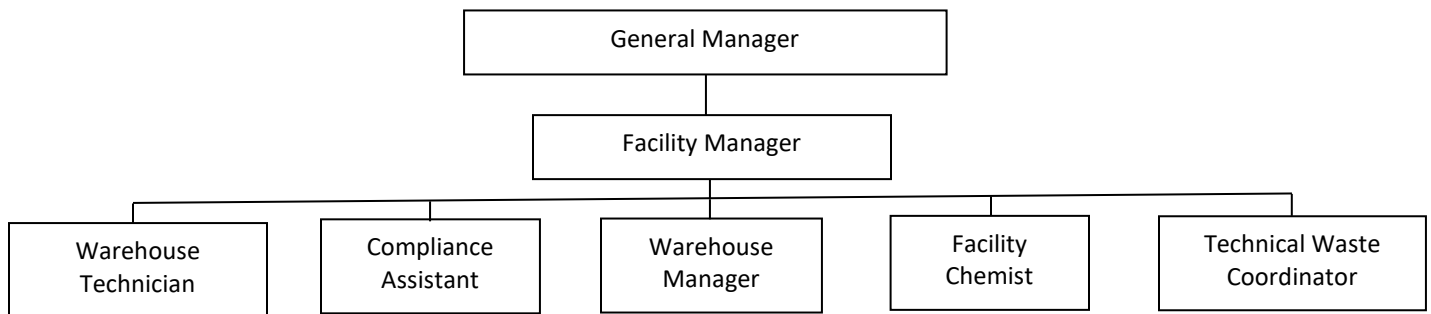
5. Training Records

The Facility will maintain documentation of the following information:

1. Title for each position related to hazardous waste management, and the name of the employee filling the position,
2. A written description for each position related to hazardous waste management,
3. A written description of the type and amount of both introductory and continuing training given,
4. Completion of introductory and continuing training for each employee

Training records for current employees are maintained onsite until closure of the Facility, or for at least three years from the date on which an employee leaves the Facility.

6. Organizational Chart



7. Job Titles and Descriptions

| TITLE: General Manager | |
|------------------------|---|
| REQUISITE SKILLS | <ol style="list-style-type: none"> 1. B.S. Degree in Chemistry or B.A. Degree in Business Administration or related field. 2. Minimum three years practical experience in hazardous waste management or chemical industry operations. 3. Minimum two years supervisory and management experience. 4. Excellent verbal and written communication skills. |
| BASIC FUNCTION | Similar to Facility Manager's function with the major responsibility for directing overall operations of the Facility. |
| RESPONSIBILITIES | <ol style="list-style-type: none"> 1. Develops and ensures effectiveness of procedures to improving waste handling, health and safety to maintain compliance with all relevant federal, state, and local regulations. 2. Coordinates logistics of scheduling trucks and delivery of waste with the Facility Manager. 3. Maintains relationships with transportation and disposal vendors. 4. Evaluates, and as needed, revises the training plan to ensure it aligns with safety and regulatory demands of the operation. |

| TITLE: Facility Manager | |
|-------------------------|---|
| REQUISITE SKILLS | <ol style="list-style-type: none"> 1. B.S. Degree in Chemistry, Environmental Studies or related science degree. 2. Minimum three years practical experience in hazardous waste management or chemical industry operations. 3. Minimum two years supervisory and management experience. 4. Skills in employee relations, customer relations and community relations. 5. Excellent verbal and written communication skills. 6. Excellent organizational skills. |
| BASIC FUNCTION | Manage a safe, efficient and profitable hazardous waste facility with direct responsibilities for training, safety, site operations, maintenance, permitting, regulatory coordination, and public community relations. |
| RESPONSIBILITIES | <ol style="list-style-type: none"> 1. Directs operations activities to achieve business goals. 2. Directs and organizes activities of personnel and reviews their performance. 3. Responsible for permitting and licensing. 4. Sets and administers company policies. 5. Assures compliance with safety and environmental regulations and internal quality assurance procedures. 6. Responsible for employee relations and morale. 7. Maintains relationships with regulatory agencies. 8. Directs work projects for facility improvement and maintenance. 9. Maintains good public relations with the local community. 10. Maintains high enthusiasm and standards for safety and quality control. |

| TITLE: Warehouse Manager | |
|---------------------------------|--|
| REQUISITE SKILLS | <p>Must be able to properly perform at a minimum, the following laboratory procedures:</p> <ol style="list-style-type: none"> 1. wet chemical analysis 2. flash point determinations 3. separatory procedures <p>Must have had experience conducting chemical analysis with both field and laboratory instrumentation.</p> |
| EDUCATION | Must have a degree in Chemistry or a related field |
| RESPONSIBILITIES | <p>Establishment of plans, practices and policies used by laboratory personnel that:</p> <ol style="list-style-type: none"> 1. Assure accurate measurement of products tested whether by “wet” analysis, gravimetric analysis or electronic instrumentation. 2. Control working environment to allow safe work practices related to the use and dispensing of laboratory chemicals. 3. Allow the Facility, on a daily basis, to comply with the Facility’s Waste Analysis Plan by providing accurate measurements and control analyses of the constituents in hazardous wastes to be treated. Assist Facility Manager in overall operation, compliance and health and safety of the Facility. |

| TITLE: Facility Chemist | |
|--------------------------------|--|
| REQUISITE SKILLS | <p>Must be able to properly perform at a minimum, the following laboratory procedures:</p> <ol style="list-style-type: none"> 1. wet chemical analysis 2. flash point determinations 3. separatory procedures <p>Must have had experience conducting chemical analysis with both field and laboratory instrumentation.</p> |
| EDUCATION | Must have a degree in Chemistry or a related field |
| RESPONSIBILITIES | <p>Establishment of plans, practices and policies used by laboratory personnel that:</p> <ol style="list-style-type: none"> 1. Assure accurate measurement of products tested whether by “wet” analysis, gravimetric analysis or electronic instrumentation. 2. Control working environment to allow safe work practices related to the use and dispensing of laboratory chemicals. 3. Allow the Facility, on a daily basis, to comply with the Facility’s Waste Analysis Plan by providing accurate measurements and control analyses of the constituents in hazardous wastes to be treated. Assist Facility Manager in overall operation, compliance and health and safety of the Facility. |

| TITLE: Warehouse Technician | |
|------------------------------------|--|
| REQUISITE SKILLS | Personnel must be trained by the Facility Manager or designated employee in the proper handling of chemicals, including the movement of hazardous waste from vehicles to the hazardous waste storage area. Must be able to operate and be trained and licensed in the operation of forklift vehicles used in the warehouse. |
| RESPONSIBILITIES | <ol style="list-style-type: none"> 1. Inspects waste containers before unloading transportation vehicle. 2. Orients containers, if required, so that labels can be readily examined by area managers. 3. After checking with the Facility Manager, transports waste, via designated routes, through warehouse to staging or storage rotation in the storage area. 4. Respond to spill or fire incidents. 5. Samples waste in containers. 6. Reports to Facility Manager/ Warehouse Manager in the facility. 7. Performs tasks associated with the cleanup, removal and storage of hazardous materials or waste. 8. Performs general warehouse work as required which includes general maintenance, operation of transfer pumps and vacuum units. |

| TITLE: Compliance Assistant | |
|------------------------------------|--|
| REQUISITE SKILLS | <p>Skills, abilities and attributes of the person in this position include:</p> <ol style="list-style-type: none"> 1. A high level of reading comprehension. 2. Detail-oriented (i.e. completeness of federal, state and municipal forms, letters and other communications) with good filing skills. 3. Ability to complete tasks in a timely manner and to recognize the need to meet specific deadlines required by law and the Facility. 4. Ability to relate information in a clear and concise manner. 5. Ability to anticipate Facility needs as they relate to compliance with federal, state and municipal regulations. 6. Typing skill equivalent to 20-40 words per minute (optional). |
| EDUCATION | The Compliance Assistant will have, at a minimum, a High School diploma or GED. The ability to read, write and understand English along with basic computer skills. |
| RESPONSIBILITIES | <ol style="list-style-type: none"> 1. Assist Facility Manager in review of incoming manifests to ensure they are complete, correct and in compliance with present regulations. 2. Review waste description of incoming shipments to determine whether material(s) recorded on manifest were correctly recorded by customer. 3. Advise Facility Manager, Customer Service and/or customers (verbally) regarding resolution of manifest discrepancies and disposition of material and other corrective actions that may be necessary. 4. Complete reports and provide to Facility Manager. |

| | |
|--|---|
| | <ol style="list-style-type: none"> 5. Prepare outgoing manifests for waste shipments. 6. Maintain the truck-to truck transfer log. 7. Assist with paperwork and all other facility administration. |
|--|---|

| TITLE: Technical Waste Coordinator | |
|------------------------------------|---|
| REQUISITE SKILLS | <ol style="list-style-type: none"> 1. B.S. Degree in Chemistry, Environmental Studies or related science degree. 2. Minimum three years practical experience in hazardous waste management or chemical industry operations. 3. Minimum two years supervisory experience. |
| BASIC FUNCTION | Manage inventory, labpack repack program and inspections, and assist the Facility Manager overall operations, including ensuring regulatory compliance and meeting the health and safety requirements of the Facility. |
| RESPONSIBILITIES | <ol style="list-style-type: none"> 1. Assist in preparing responses to USEPA and ADEQ regulatory requirements. 2. Waste and document preparation regulatory and safety review. 3. Waste management and emergency response. 4. Waste inventory management. 5. Become familiar with packaging guidelines and disposal facility selection. 6. Develop an understanding of OSHA regulations, the Facility's Health and Safety Practices, the Facility's hazardous waste facility permit, and USEPA regulations. 7. Work towards becoming familiar with technical, customer service, and business components of environmental services. |