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H.0 Personnel Training

This section outlines the personnel training program for the management of hazardous waste at the US Ecology Idaho, Inc.(USEI) facility. The training program has been developed to satisfy the requirements of IDAPA 58.01.05.008 and IDAPA 58.01.05.012 (40 CFR 264.16 and 270.14(b)(12)). The required training is designed to prepare personnel to safely and properly manage and operate the facility in compliance with applicable regulations and in a manner that minimizes hazards to human health and the environment.

The information contained in this section describes the various introductory and continuing components of the training program, how the training program prepares personnel to safely perform their job duties, and the qualifications of the training instructors.

H.1 Outline of the Training Program

The training program is designed to instruct personnel in the safe and proper handling, packaging, labeling, storage, treatment, and transportation of hazardous materials and waste. Both introductory and continuing training are provided. The site maintains a comprehensive Health and Safety Plan that outlines the required OSHA training programs. An outline of the Continuing Training Program is presented in Table H-1. An outline of the initial training program is provided in Table H-2.

Training is accomplished through a balanced use of formal and informal instruction. Formal instruction includes classroom instruction. Informal training or on-the-job training involves performing job related activities under the direction and/or supervision of experienced personnel, or discussion of job-specific topics with experienced personnel. Personnel are instructed in both general facility information and procedures. Additionally, personnel are trained on specific programs, procedures, and equipment relating to their job functions.

H.1.a Job Titles/Job Descriptions

A list of employees with their job titles and descriptions is maintained at the facility pursuant to IDAPA 58.01.05.008 (40 CFR 264.16(d)(1) and (2)). These job titles and descriptions (position descriptions) are updated as needed. These categories are largely defined by the level of involvement and responsibility required for the day-to-day management of hazardous waste activities. An overview of job titles and general job descriptions is presented in Table H-3.

H.1.b Training Content, Frequency, and Techniques

The program for training employees in the safe handling of hazardous wastes has been organized into a series of training sessions. These sessions are generally presented in 1 or 2 hour presentations. However, session times may vary depending upon specific training needs and objectives. Specific safety and/or regulatory presentations are also included as part of these sessions to keep facility personnel up to date and aware of new information and procedures. All facility personnel are trained in the requirements of the Contingency Plan. Provisions are also made for updating or revising the course content as necessary to reflect new regulations, operations, and technical advancement.

On an annual basis, employees are trained pursuant to IDAPA 58.01.05.008 (40 CFR 264.16). It includes, at a minimum, a review of new environmental regulations and review of the Contingency Plan. An outline of this continuing training program is provided in Table H-1. This annual training is a basic review of the initial 24-hour training program described in the USEI Health and Safety Plan. An outline of the initial 24-hour training program is provided in Table H-2.

Training courses teach the proper procedures, equipment, and systems to be used in managing hazardous wastes at the facility. Table H-4 presents a matrix showing the training typically provided to each general job position category. Typical training course descriptions for the ongoing program are maintained on-site for inspection pursuant to IDAPA 58.01.05.008 (40 CFR 264.16(d)(4)).

To augment formal classroom training, on-the-job training is provided by experienced personnel. This on-the-job training teaches and reinforces the proper methods of operation for specific job duties in compliance with the requirements of IDAPA 58.01.05.008 (40 CFR 264.16).

H.1.c Training Director

The training program at the facility is directed by an individual experienced in the requirements of hazardous waste management and safety procedures. The Training Director's job title is Safety Coordinator and/or Manager, and the specific descriptions of this position are kept on file at the facility. The Training Director reviews job descriptions and training requirements periodically and makes necessary revisions so that the required training is adequate for personnel to perform their job duties in compliance with IDAPA 58.01.05.008 (40 CFR 264.16(a)(2)). The Training Director is assisted in his duties and draws upon the experience of the managers, directors, and supervisors.

H.1.d Relevance of Training to Job Position

In accordance with IDAPA 58.01.05.008 (40 CFR 264.16(a)(2)), the training staff is responsible for teaching hazardous waste management and safety procedures, including Contingency Plan implementation, to all personnel handling wastes. As seen in Table H-4, the training program is designed to provide training to personnel that is relevant to their position within the facility. Table H-3 gives an overview of titles and general job descriptions.

H.1.e Training for Emergency Response

Pursuant to IDAPA 58.01.05.008 (40 CFR 264.16(a)(3)), emergency response training is designed to instruct personnel to properly and safely respond to emergency situations. Training elements address non-routine and emergency situations such as unscheduled interruption of operations, fires, explosions, or spills and include the following:

- Contingency Plan and emergency procedures.
- Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment.
- Procedures for automatic waste feed cut-off systems.
- Communications and alarm systems.
- Response to fires and explosions.
- Response to groundwater contamination incidents.
- Shutdown of operations.

All personnel handling hazardous waste are trained in immediate response, basic spill response, and the Contingency Plan requirements. The emergency response personnel are utilized for spills, fires, and other emergencies beyond the training and abilities of the other operational personnel. The emergency response personnel receive additional classroom and other special training.

H.2 Implementation of Training Program

As discussed in paragraph H.1.b of this Section, all new facility employees will complete specific training courses. Operations/maintenance personnel will complete this training prior to commencing their job

duties. The completed training course will provide them with the minimum instruction necessary to function at the facility. All facility personnel will be trained within six months of their employment.

Additional job specific training is offered either formally or informally within six months after the effective date of employment or assignment to a new area. Prior to completion of training, personnel other than maintenance personnel may handle waste when under the direct supervision of a trained individual prior to their independently handling hazardous waste pursuant to IDAPA 58.01.05.008 (40 CFR 264.16(b)). All facility employees are required to be trained in the contents of the Contingency Plan.

H.3 Training Records

In accordance with IDAPA 58.01.05.008 (40 CFR 264.16), training events, safety meetings, seminars, and off-site course work are documented in the personnel training records. These records are maintained at the facility for current personnel. Training records for former employees will be kept for a minimum of 3 years from the date the employee last worked at the facility. Personnel training records will follow employees transferred to other company-owned/operated facilities.

Table H-1

Outline of Typical Continuing Training Program¹

<u>Mod. No.</u>	<u>Title</u>
Module 1	Review of OSHA's 29 CFR 1910.120 <ul style="list-style-type: none">• Hazardous Waste Operations and Emergency Response
Module 2	Review of Chemical Concepts/Toxicology
Module 3	Review of Respiratory/PPE/Decontamination/Heat Stress
Module 4	Review of Hazard Communication
Module 5	Review of Permit Procedures (e.g., Lockout/Tagout, Confined Space)
Module 6	Annual RCRA Training/Emergency Action/Contingency Plan Review <ol style="list-style-type: none">a. Procedures for using, inspecting, repairing, replacing, and maintaining facility emergency equipment and monitoring equipmentb. Key parameters of automatic waste feed cut-off systemsc. Communication and alarm systemsd. Response to fires/explosionse. Response to groundwater contamination incidentsf. Shutdown of operations
Module 7	Review of TSCA Regulations
Module 8	Review of DOT Regulations
Module 9	New Regulation Update (RCRA, TSCA, DOT)
Module 10	Hands-on Exercise - Use of PPE and Respiratory Protection

¹Modules may not be presented in the order listed. Total length of continuing training will be approximately 8 hours.

Note: Modules are outlined in more detail within the USEI Health and Safety Plan.

Table H-2
Typical Initial Training Program

Day 1 Topic	Estimate Hours
Introduction to US Ecology	0.25
Introduction to US Ecology Idaho	0.25
Safety Culture Orientation and Corporate Values	0.25
Introduction to Hazardous Waste - The TSD Business	0.25
Break	0.25
OSHA Overview – HAZWOPER	1.00
Introduction to RCRA	0.50
Introduction to TSCA	0.50
Introduction to IDEQ and the Operating Permit	0.25
Hazardous Waste Characteristics	0.25
Waste Stream Identification	0.25
Lunch	0.50
Contingency Plan	0.75
Radiation Safety Program	1.00
Break	0.25
Chemical Concepts	0.25
Corrosives	0.25
Organics/Inorganics	0.25
Break	0.25
Toxicology and Industrial Hygiene	0.50
Day 2	Estimate Hours
Site Characterization	0.50
Site Control	0.50
Hazard Analysis	0.50
Training	0.25
Medical Surveillance	0.25
Break	0.25
Engineering Controls, Work Practices, and PPE	1.00
Monitoring	0.25
Drums and Containers	0.25
Decontamination	0.50
Lunch	0.50
Emergency Response	0.25
Incident Reporting	0.25
Hazard Communication	0.50
Respiratory Protection	0.50
Lockout Tagout	0.25
Break	0.25
Confined Space Entry	0.25

Fire Prevention	0.25
Hand and Power Tools	0.25
Hearing Conservation Program	0.25
Electrical Safety	0.25
Day 3	Estimate Hours
Heavy Equipment	0.25
Forklift Operations	0.25
Driving and Traffic Flow	0.25
Site Specific and RTF Specific Hazards	0.25
Break	0.25
Manifests, Labels, and Placards	0.25
Waste Tracking (WPF, ICF, Truck Schedules, Safety Codes)	0.25
Break	0.25
Environmental Hazards - Thermal Extremes	0.50
Arsenic, Cadmium, and Lead	0.50
Review	1.00
Lunch	0.50
Quiz	1.00
Break	0.25
Hands-On Exercises	2.00
Fit-Test	
PPE	
Level B Simulation	
Site Tour	

Table H-3
 Overview of Job Titles and Descriptions

JOB TITLE	GENERAL JOB DESCRIPTION
Managers	Generally responsible for day-to-day specific facility operations. Responsible for personnel assigned to their area. Managers also oversee administrative functions associated with their assigned areas. Must be familiar with all specific facility operations, procedures, and equipment within their assigned areas. Must have a degree of proficiency in the required regulations and permits that allows them to oversee hazardous waste activities within their assigned areas.
Supervisors	Generally responsible for day-to-day operations of a specific facility area. Supervisors oversee the more specific hands-on duties that are being performed on a daily basis. Supervisors may also perform administrative functions as related to a specific area of operations. Must be familiar with all specific operations, procedures, and equipment related to their assigned area(s). Must be familiar with the requirements of the environmental regulations and permits as they relate to their assigned area(s).
Foremen	Generally responsible for day-to-day operations of a specific facility area. Foremen oversee the hands-on duties of a specific facility area. Must be familiar with all operations, procedures, and equipment associated with their assigned area(s).
Operators	Generally responsible for operating equipment related to specific facility areas. Operators may be assigned to different equipment so they will be familiar with the correct operations of all facility-related equipment directed by either a supervisor or a foreman. Operators are directed by either a supervisor or a foreman.
Chemists	Generally responsible for QA/QC activities related to incoming and outgoing waste streams. Chemists will be familiar with the requirements of specific facility areas as they relate to the treatment of hazardous waste.
Technicians	Generally responsible for the day-to-day hands-on operational functions. Technicians will be familiar with area-specific operations and are managed and directed by either a supervisor or a foreman.
Coordinators	Generally responsible for overseeing the more administrative functions of a specific facility area. Coordinators are trained in the procedures of facility operations, but generally only handle paperwork related to waste management.
Administrators	Generally responsible for administrative functions related to day-to-day facility operations. Administrators generally do not handle hazardous waste, but rather oversee the paperwork flow related to waste activities.
Emergency Response Personnel	Generally responsible for emergency response procedures throughout the entire facility as outlined in the Contingency Plan. Personnel must be well trained in applicable emergency response procedures.

Table H-4
General Job Position Training Requirements

	24-hour Initial Training ¹	Initial/ Refresher/ Continuing Training ¹	Contingency Plan	Hazardous Materials Handling	Hazardous Waste Regulations	Hazardous Materials PPE	Equipment Training	Indoor Stabilization Building	First Aid/ CPR	Response Procedures
Managers	X	X	X	X	X	X	R	R	R	R
Supervisors	X	X	X	X	X	X	R	X	R	R
Foremen	X	X	X	X	X	X	X	X	R	R
Operators	X	X	X	X	X	X	X	X	R	NR
Chemists	R	R	X	X	X	X	R	R	R	NR
Technicians	X	X	X	X	X	X	X	X	R	NR
Coordinators	R	R	X	NR	R	R	NR	R	R	NR
Administrators	R	R	X	NR	R	R	NR	NR	R	NR
Emergency Response Personnel	X	X	X	X	X	X	X	R	X	X

Key:

- X = Required
- R = Recommended
- NR = Not Required

¹ Covered under Health and Safety Plan. The training program administered by USEI utilizes the required OSHA training elements with the RCRA training elements. The Health and Safety Plan provides the detail associated with the specific training modules.

² Although not required as part of USEI's training program, USEI encourages individual participation in EMT training.