

A.10. Personnel training program

FORM EQP 5111 ATTACHMENT TEMPLATE A10
PERSONNEL TRAINING

This document is an attachment to the Michigan Department of Environmental Quality's *Instructions for Completing Form EQP 5111, Operating License Application Form for Hazardous Waste Treatment, Storage, and Disposal Facilities*. See Form EQP 5111 for details on how to use this attachment.

The administrative rules promulgated pursuant to Part 111, Hazardous Waste Management, of the Michigan's Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), R 299.9501, R 299.9605 and Title 40 Code of Federal Regulations (CFR) §§264.16 and 270.14(b)(12), establish requirements for personnel training programs at hazardous waste management facilities. All references to 40 CFR citations specified herein are adopted by reference in R 299.11003.

This license application template addresses requirements for a personnel training program at the hazardous waste management facility for the **Wayne Disposal, Inc. (WDI)** in **Belleville**, Michigan. The information included in the template demonstrates how the facility meets the personnel training requirements for hazardous waste management facilities.

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A10.A CONTENT OF INTRODUCTORY AND CONTINUING EDUCATION TRAINING PROGRAMS

[R 299.9605 and 40 CFR §264.16(a)]

Facility personnel shall successfully complete a program of instruction and on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this part. Michigan Disposal Waste Treatment Plant (MDWTP) and Wayne Disposal Inc. (WDI) provide both introductory and ongoing training on a wide variety of health and safety, emergency, and operational modules. Per the regulations, training includes the following:

- Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment
- Key parameters for automatic waste feed cutoff systems
- Communications or alarm systems
- Response to fires or explosions
- Response to groundwater contamination incidents
- Shutdown of operations

A10.A.1 OUTLINE FOR INTRODUCTORY TRAINING PROGRAM

[R 299.9605 and 40 CFR §§264.16(a)(1) and 264.16(d)(3)]

All facility personnel filling positions related to hazardous waste management at the facility receive introductory training. The training consists of the following topics:

- HAZWOPER
 - Health protection
 - Safety Procedures
 - Hazardous nature of chemical and chemical waste
- RCRA
 - Contingency Plan
 - Evacuation Routes
 - Emergency Coordinator
 - Emergency Procedures
 - Emergency communication
 - Spill Response
 - Shutdown of operations
 - Response to fires and explosions
 - Emergency equipment location and use
 - Waste Analysis Plan
 - Hazardous Waste Identification
 - Proper and safe handling and storage procedures for wastes
 - Treatment and Land Disposal Restrictions
 - Analytical Procedures
 - Sampling Methods
 - Fingerprinting
 - Tank Clearance
 - Manifest Requirements
 - Recordkeeping and reporting
 - Procedures for Handling Ignitable, Reactive and Incompatible Wastes

Job specific training teaches employees how to perform their specific duties in a way that ensures the facility's compliance with the requirements of its license. Operational training is offered to employees directly involved with the tasks while others may receive an awareness level training.

A10.A.2 OUTLINE FOR CONTINUING EDUCATION

[R 299.9605 and 40 CFR §§264.16(a)(1) and 264.16(d)(3)]

Continued training is conducted on a schedule administered by the site management team. A training matrix identifies training requirements by position. In addition to annual HAZWOPER refresher training requirements, each employee is assigned additional training directly applicable to their job description as needed. The level of training (awareness or operational) depends on the individual's job description. At a minimum annual refresher training consists of the following topics:

- HAZWOPER
 - o Health protection
 - o Safety Procedures
 - o Hazardous nature of chemical and chemical waste
- RCRA
 - o Contingency Plan
 - Evacuation Routes
 - Emergency Coordinator
 - Emergency Procedures
 - Emergency communication
 - Spill Response
 - Shutdown of operations
 - Response to fires and explosions
 - Emergency equipment location and use
 - o Waste Analysis Plan
 - Proper and safe handling and storage procedures for wastes

A10.B PERSONNEL SUBJECT TO TRAINING REQUIREMENTS

[R 299.9605 and 40 CFR §§264.16(a),(d)]

A10.B.1 JOB TITLES AND JOB DESCRIPTIONS

[R 299.9605 and 40 CFR §§264.16(d)(1),(2)]

A written job description is provided for each position held at MDWTP/WDI. Each position description that identifies job tasks, job location and required training.

A10.B.2 DESCRIPTION OF HOW TRAINING IS DESIGNED TO MEET ACTUAL JOB TASKS

[R 299.9605 and 40 CFR §§264.16(a)(1) and (d)(3)]

The training program is designed to teach facility personnel hazardous waste management procedures, including contingency plan implementation relevant to his/her position. The facility management team is responsible for identifying the initial and continuing training needs of his/her employees to ensure facility compliance with RCRA. Departmental managers also provide instruction for job-specific procedures and are responsible for overseeing the employee's on-the-job training. Specialized mandatory training requirements are coordinated through regulatory and health and safety staff.

A10.C FREQUENCY OF REQUIRED TRAINING

[R 299.9605 and 40 CFR §§264.16(b), (c)]

A10.C.1 INITIAL TRAINING

[R 299.9605 and 40 CFR §264.16(b)]

Each affected person completes the program within six months after the effective date of these regulations or six months after the date of their employment or assignment to a facility, or to a new position at a facility, whichever is later. Employees hired after the effective date of these regulations do not work in unsupervised positions until they have completed the required initial training as well as job-specific training needed to perform their tasks.

A10.C.2 CONTINUING EDUCATION

[R 299.9605 and 40 CFR §264.16(c)]

Continuing education training is completed in accordance with the requirements of the mandatory training. Job specific training requirements are refreshed on an as needed basis at the discretion of the management team. At a minimum, facility personnel take part in an annual review of the initial training.

A10.D TRAINING DIRECTOR

[R 299.9605 and 40 CFR §264.16(a)(2)]

Training will be completed by qualified personnel or contractors (based on experience or education) knowledgeable in hazardous waste management procedures.

A10.E DOCUMENTATION AND RECORDKEEPING REQUIREMENTS

[R 299.9605 and 40 CFR §§264.16(d) and (e)]

A10.E.1 DOCUMENTATION

[R 299.9605 and 40 CFR §264.16(d)]

A10.E.1(a) Job Titles and Names of Employees Filling Each Job

[R 299.9605 and 40 CFR §264.16(d)(1)]

Job titles and employee names filling the positions are maintained at the facility in electronic or paper form and are updated to meet the needs of the facility.

A10.E.1(b) Written Job Descriptions

[R 299.9605 and 40 CFR §264.16(d)(2)]

Job descriptions are maintained at the facility in electronic or paper form and are regularly updated by facility personnel and human resources to reflect the needs of the position.

A10.E.1(c) Written Description of Type and Amount of Training Given to Each Position

[R 299.9605 and 40 CFR §264.16(d)(3)]

Written descriptions of the type and amount of training given to each position are maintained by the facility management and are determined based on the tasks performed by personnel.

A10.E.1(d) Documentation That Training Has Been Given to and Completed by Facility Personnel

[R 299.9605 and 40 CFR §264.16(d)(4)]

Training is documented by electronic or paper records indicating completion of the training. Forms that may be used to document training include but are not limited to certificates of completion or sign in sheets. Where the facility deems it necessary testing may be completed to determine competency.

A10.E.2 RECORD KEEPING

[R 299.9605 and 40 CFR §264.16(e)]

Training records are maintained at the facility in paper or electronic form. Record retention is completed in accordance with RCRA requirements with current personnel being kept until the closure of the facility and former personnel being kept for 3 years after their departure.