

SECTION H

PERSONNEL TRAINING PROGRAM

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2523 Mutahar Street
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**February 2007
Revision 0**

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H.1 INTRODUCTION

This section presents an overall description of the personnel training program established for handling of hazardous wastes at the Siemens Water Technologies Corp. (SWT) facility. This facility will meet the personnel training requirements of 40 CFR 270.14(b)(12) and 264.16. Employees will complete the introductory training program for their particular job description within six months after they are hired or promoted, and will not be assigned to unsupervised positions which would require them to handle hazardous wastes until they have completed the introductory training. Continuing training will also be administered to all employees on a cumulative or annual basis. Training may be given in-house or by a contractor specifically retained for that purpose.

The entire training program including this description, a training syllabus outline, and supporting information are kept on file at the facility and are reviewed and updated as necessary to accommodate changes in procedures and regulations and to ensure compliance with the requirements found in 40 CFR 264.16.

H.2 TRAINING PROGRAM METHODS

The training program will be given using various media, which may include, but are not limited to, classroom discussions, CD-ROMs, video, written manuals, practical demonstrations, and other methods. Training on required subjects will be given on an introductory and continuing basis.

H.3 INTRODUCTORY TRAINING

Introductory Training required by 40 CFR 264.16 will include the following, at a minimum:

- (i) Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment.
- (ii) Key parameters for automatic waste feed cut-off systems.
- (iii) Communications and alarm systems.
- (iv) Responses to fires and explosions.
- (v) Prevention and responses to groundwater contamination incidents.
- (vi) Shut down of operations.
- (vii) Contingency Plan implementation.
- (viii) Proper management of hazardous waste at the facility.

In addition, waste sampling training is provided to personnel who may be required to collect samples of the incoming spent activated carbon shipments or the in-process material.

A training syllabus outline is included as Appendix XIV. Appendix XIV describes the typical training content that is available for SWT employees managing hazardous waste at the facility. Each RCRA topic is typically addressed in the training program.

H.4 CONTINUING TRAINING

The continuing training will consist of an annual review of subjects listed under introductory training, as required by 40 CFR 264.16.

All facility employees will take part in the continuing training program. The annual review will incorporate a review of all introductory RCRA topics. Requirements for waste treatment, storage, and/or disposal, and emergency and contingency procedures may be discussed. Any accidents or incidents during the past year may be reviewed, and any unsatisfactory conditions noted on inspection reports will be discussed. Employees will also be asked to provide comments and suggestions about the training program.

H.5 TRAINING RELEVANCE UNDER 40 CFR 270.14(b)(12)

Examples of operations and procedures that occur within the facility will be utilized to explain how RCRA training topics apply. Such examples may include, but are not limited to, analysis and explanations regarding the facility's piping and instrument diagrams (P&IDs), alarm and communication systems, maintenance procedures for RCRA waste management units, standard operating procedures for equipment operations, fire protection equipment, procedures for notifying management regarding potential contamination incidents, and operational shutdowns.

For new employees, training relevance is ensured by adherence to the following schedule, so that personnel being trained will encounter specific examples during the course of operations as follows:

1. *Initial Period.* For this period, a new trainee will primarily observe the daily operations of the facility under the direct supervision of the Plant Manager, the Plant Foreman, or the Environmental Health and Safety Specialist (or designee) (depending upon his duties). The new employee will be familiarized with their role in implementing the Contingency Plan.
2. *First Six Months.* During this period, the trainee will be expected to conduct activities consistent with his/her assigned duties, under the control of their immediate supervisor. The trainee will assist in waste handling and treatment operations pertinent to his or her job description. They must be aware of those operations that could cause damage to human health or the environment. They will also be expected to assist with record keeping and documentation associated with their assigned tasks.
3. *After 6 Months.* The trainee must know and be capable of performing all waste handling and treatment procedures pertinent to their job description. The trainee must be able to properly handle hazardous waste and perform their job with only routine supervision.

H.6 JOB SPECIFIC TRAINING

The introductory and continuing training required, as well as the extent of training needed in each subject, is dependent upon the employee's specific job responsibilities. Employees will receive continuing training for all topics that were covered in the introductory training program. The extent of training required for each job title is presented in Table H-1.

If additional job titles are added, the training for each new job title will be maintained at the facility with a description of the applicable training.

TABLE H-1 Job Titles – Introductory and Continuing Training Requirements

Job Title							
	Procedures for Using/Inspecting/Repairing/Replacing Emergency and Monitoring Systems	Key Parameters for Automatic Waste Feed Cut-Off Systems	Communication and Alarm Systems	Prevention and Responses to Fire and Explosions	Responses to Ground Water Contamination Incidents	Shut Down of Operations	Contingency Plan Implementation
Plant Manager	X	X	X	X	X	X	X
EH&S Specialist/ Profile Chemist	X	X	X	X	X		X
Plant Operator(s)	X	X	X	X	X	X	X
Asst. Plant Operator(s)	X	X	X	X	X	X	X
Transportation Coordinator	X	X	X	X	X	X	X
Material Handlers	X	X	X	X	X	X	X
Electrician/Millwright	X	X	X	X	X	X	X
Admin. Assistant			X				

H.7 ADMINISTRATION OF TRAINING

The Environmental, Health, and Safety (EH&S) Manager is responsible for the implementation and management of the training program. The EH&S Manager is to be thoroughly familiar with all aspects of the training subjects contained in the training outline, Appendix XIV, and the Contingency Plan. The EH&S Manager is an off-site corporate position.

H.8 TRAINING PROGRAM IMPLEMENTATION

The training program will be implemented as described in Chapters H.2 through H.5 of this section and will ensure the following:

1. Facility personnel will complete the training program within six months after date of employment, or change of duties, that results in a need for additional training.
2. Facility personnel will work only in supervised positions, until they successfully complete training.
3. Facility personnel will participate in continuing training.

H.9 JOB TITLES, REQUISITE QUALIFICATIONS, AND DESCRIPTIONS

Job Titles, Requisite Qualifications. Applicable information for each job title related to hazardous waste management is listed in Table H-2. The most current information for each job title related to hazardous waste management is maintained at the facility. An example job description is listed in Table H-3. The most current job descriptions for each job title related to hazardous waste management are maintained at the facility.

Table H-2 Job Titles and Corresponding Education & Experience	
Job Title	Required Education and Experience
Plant Manager	B.S. in Engineering and/or 5 years Experience in Hazardous Waste/Materials Management and Plant-Supervisory Experience.
EH&S Specialist/Profile Chemist	High School Graduate or GED with college degree or Appropriate Experience
Plant Operator(s)	High School Graduate or GED and Appropriate Experience
Asst. Plant Operator(s)	High School Graduate or GED
Electrician/Millwright	High School Graduate or GED and Appropriate Experience
Material Handler(s)	High School Graduate or GED
Traffic Controller	High School Graduate or GED and Appropriate Experience
Administrative Assistant	High School Graduate or GED and Data Entry and Typing Experience

Job Descriptions. An example job description appears in Table H-3.

<p>TABLE H-3 EXAMPLE JOB DESCRIPTION</p>
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<p>PLANT MANAGER - The Plant Manager (PM) is responsible for overall management and production at the facility. The PM ensures that the waste handling operations are safely and correctly performed and that all regulatory requirements are met. The PM will ensure that the Contingency Plan is kept up to date and RCRA training is occurring. The PM will review all plant records, including the operating log and records of inspections and will ensure that this documentation is correctly performed and that records are maintained as specified by the permit and other applicable regulations.</p>
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H.10 TRAINING DOCUMENTATION AND RECORDS RETENTION

Training documentation - Documentation will be completed and maintained by completion of the example training documentation form as contained in Appendix XIV. In the event that regulatory requirements or additional training is needed, the form used for documentation may be a revised version. However, at least the minimum information, as listed in the original form, will be retained on any subsequent form.

Records Retention Time Frame. Training documentation on current personnel will be retained at the facility until it closes. Records on former personnel will be retained for at least three years from the date the employee last worked at the SWT Facility.

H.11 FACILITY STAFFING DESCRIPTION

Approximately fourteen employees may be present at the hazardous waste facility during the day shift. Fewer employees will be present at other times of the day and on weekends. Adequate staffing is provided to ensure that at least one person is present at all times who is knowledgeable in all facility operations. Normal staffing will consist of the following:

<u>Job Title</u>	<u>Number of Employees</u>
Plant Manager	1
Administrative Assistant	1
EH&S Specialist/Profile Chemist	1
Transportation Coordinator	1
Plant Operator(s)	4
Assistant Plant Operator(s)	4
Electrician/Mill Wright	2
Material Handler(s)	5
TOTAL	19
Product Material Handler (Non RCRA Regulated Position)	2