

PERMIT ATTACHMENT E

PERSONNEL TRAINING Modified from the Permit Application, Volume I, Section 7.0

7.0 PERSONNEL TRAINING

The personnel training program for the Facility will be developed in accordance with 40 CFR 264.16 as adopted by the State of New Mexico in the New Mexico Hazardous Waste Management Regulations, Part V. This plan documents training procedures to be used by the Facility for all new employees and refresher training for experienced workers to ensure that all employees perform their work in full compliance with 40 CFR 264.16.

As illustrated in Figure 7-1, personnel will be divided into three categories for the purposes of the RCRA training: Facility personnel, visitors, and off site emergency response personnel. Facility personnel will be further categorized based on whether or not they will handle hazardous waste. Personnel will receive training appropriate to their specific job responsibilities. All Facility personnel will be required to complete classroom training within six months of employment and annually according to the requirements of the CFR 264.16. Employees who will handle hazardous waste and supervisors of employees who will handle hazardous waste will be required to complete on-the-job training (OJT) and OSHA 40-hour training and annual refreshers. Employees assigned to the Facility will not be allowed to work without direct supervision until completing the training program relevant to the positions in which they are employed. New personnel will be required to complete their training program as soon as practicable, but no later than six months, following their effective date of employment at the Facility.

Section 7.1 describes job titles, qualifications, and duties; Section 7.2 describes training content and frequency; and Section 7.3 describes record keeping procedures.

7.1 JOB TITLES AND DUTIES

To facilitate safe and effective Facility operation, the training program is designed to provide training commensurate with job responsibilities. A list of qualifications, duties, and special training required for appropriate personnel will be developed and maintained onsite prior to commencement of operations. This section includes a description of the qualifications and responsibilities of the RCRA training officer, the EC, waste handlers, the site security officer, laboratory specialists, and maintenance personnel. Although other categories of personnel may work at the site, these six categories include key personnel with respect to ensuring safety and compliance and therefore are included in this section. It is important to note that one person may fulfill the responsibilities of more than one of the job categories outlined below.

7.1.1 RCRA Training Officer

The RCRA training officer will be responsible for developing and implementing a RCRA training program that is in compliance with 40 CFR 264.16, Personnel Training.

The RCRA training officer will possess the following qualifications:

- a four-year science or engineering degree or sufficient experience in hazardous waste management to oversee the training program;
- working knowledge of the New Mexico Hazardous Waste Act and the New Mexico Hazardous Waste Management Regulations;
- knowledge of site-specific hazardous waste management procedures;
- a thorough understanding of the purpose of the Contingency Plan and emergency procedures and the ability to implement them; and,
- 40-hour OSHA and annual refresher training.

The RCRA training officer will have the following responsibilities:

- developing and implementing the RCRA training program, including classroom training development and revision;
- establishing course curricula;
- conducting training;
- maintaining and updating, as needed, a list of all employees requiring training; this list will provide a personalized training history for each employee, which includes job title, training schedule, course attendance, and test results;
- reviewing any new job classifications to determine if on-the-job-training (OJT) is required (supervisors may also request that employees receive OJT);
- scheduling training;
- ensuring that all personnel with RCRA responsibilities are trained as soon as practicable following the effective date in a position and are annually updated; and,
- conducting an annual review to determine which personnel require OJT.

7.1.2 Emergency Coordinator

The EC will coordinate all emergency response activities and will have the authority to commit the resources necessary to implement the Contingency Plan contained in Section 6.0. The Facility will appoint a primary EC as well as secondary ECs to ensure that someone is always available to serve as the EC. The secondary ECs must meet the same qualifications and responsibilities, outlined below, as the primary coordinator.

The EC will possess the following qualifications:

- a four-year science or engineering degree or sufficient experience in hazardous waste management and emergency response to coordinate all aspects of emergency response;

- working knowledge of the New Mexico Hazardous Waste Act and the New Mexico Hazardous Waste Regulations;
- familiarity with all aspects of the Contingency Plan and emergency procedures, all operations and activities at the Facility, the location and characteristics of waste handled, the location of records within the Facility, and the Facility layout prior to acting as EC; and,
- 40-hour OSHA training, annual refreshers, and OSHA supervisor training.

The EC will have the following responsibilities:

- either being on the Facility premises or being available to respond to an emergency by reaching the Facility within a short period of time;
- notifying all appropriate Facility personnel upon awareness of an emergency situation;
- notifying all appropriate state or local agencies with designated response roles;
- identifying the character, exact source, amount, and extent of any released materials;
- assessing possible hazards to human health and the environment that may result from a release, fire, or explosion;
- notifying local authorities if a release, fire, or explosion has occurred that could threaten human health or the environment;
- notifying the National Response Center if a release, fire, or explosion occurs that could threaten human health or the environment;
- taking all reasonable measures during an emergency to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the Facility;
- if appropriate, when the Facility ceases operations in response to a release, fire, or explosion, monitoring for leaks, pressure build-up, gas generation, or ruptures in equipment;
- providing for the treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the Facility;
- ensuring that no waste that may be incompatible with the released material is treated, stored, or disposed until cleanup procedures are completed and that emergency equipment is cleaned and fit for its intended use prior to resumption of operations;
- notifying NMED and appropriate local authorities before operations are resumed;
- noting in the operating record the time, date, and details of any incident that requires implementing the Contingency Plan; and,
- submitting a written report to the NMED within 15 days of implementing the Contingency Plan.

7.1.3 Waste Handlers

Waste handlers will perform sampling, screening, unloading, transfer, storage, and loading of material.

The waste handlers will possess the following qualifications:

- high school diploma or equivalent; and,
- two years of experience in hazardous waste operations.

The waste handlers will have the following responsibilities:

- verifying waste received;
- testing emergency equipment;
- inspecting Facility and emergency equipment;
- managing containers in such a way as to prevent leaks, spills, and ruptures;
- inspecting container storage areas, tanks, the evaporation pond, and the landfill;
- inspecting roll-off containers and drums for cracks or holes.
- repair of defects on roll-off containers and drums.
- inspection of non-regulated but potential SWMU units;
- maintaining run-off management system, control wind dispersal, and ensure compliance with other operational requirements specific to the RCRA permit;
- assisting in maintaining the operating record; and,
- preparing biennial reports, unmanifested waste reports, and other reports as necessary.

7.1.4 Site Security Officers

The site security officers will control access to the Facility, ensure site security, and possess high school diplomas or equivalent.

The site security officers will have the following responsibilities:

- controlling entry, at all times, through gates or other entrances to the active portion of the Facility;
- ensuring site security;
- inspecting the perimeter fence to prevent unknowing entry and prevent the unauthorized entry of persons or livestock onto the active portion of the Facility; and,

- initially locating and then maintaining warning signs that indicate “Danger - Unauthorized Personnel Keep Out” in both English and Spanish, which will be posted on the perimeter fence and will be legible from a distance of 25 feet.

7.1.5 Laboratory Specialist

The laboratory specialist will help to assure that wastes received at the Facility are consistent with waste profiles supplied by generators.

The laboratory specialist will possess the following qualifications:

- a four-year science degree or sufficient experience to adequately perform acceptance testing;
- working knowledge of the New Mexico Hazardous Waste Act and the New Mexico Hazardous Waste Regulations; and,
- familiarity with the Waste Analysis Plan and waste analysis practices and procedures.

The laboratory specialist will have the following responsibilities:

- developing sampling, characterization, and testing procedures for waste received and generated at the Facility;
- directing or performing sampling, characterization, and testing for the Facility;
- determining if waste is acceptable for treatment, storage, and disposal according to waste profile information submitted by the generator;
- determining if the initial and annual full chemical analysis and fingerprint analysis confirm generator information provided on the waste profile and manifest; and,
- implementing the laboratory QA/QC program.

7.1.6 Maintenance Personnel

Maintenance personnel will maintain all equipment, buildings, roads and ditches.

Maintenance personnel will possess the following qualifications:

- high school diploma or equivalent; and,
- two years experience in an industrial setting.

Maintenance personnel will have the following responsibilities:

- developing maintenance procedures; and,

- performing maintenance-type activities, including repairs, preventive maintenance, and corrective actions associated with RCRA inspections.

7.2 TRAINING CONTENT AND FREQUENCY

Section 7.2.1 describes the training program for Facility personnel, Section 7.2.2 describes training for visitors, and Section 7.2.3 describes training for off site emergency response organizations.

7.2.1 Training Program for Facility Personnel

All new employees will be required to successfully complete the training program related to their position. Training programs will include RCRA classroom training, job specific training, OSHA 40-hour training, and annual refresher training for all three programs. OJT and OSHA 40-hour training sessions will be required only for those personnel who will handle hazardous waste and the supervisors of personnel who will handle hazardous waste. Employees will not be permitted to assume unsupervised job duties until successful completion of all the required elements of their training program. As soon as practicable following a new employee's hire date, successful completion of the training program specific to his or her position must be accomplished, and certification of the completion will be recorded and kept on file by the RCRA training officer.

7.2.1.1 Classroom Training

The initial classroom training will consist of at least one 8-hour session. Annual refresher training will consist of at least one 4-hour session. The outline of the annual refresher is the same as the outline for the initial classroom training; however, the refresher training will be an abbreviated version of the initial training at an accelerated pace. The RCRA classroom training will include the following goals:

- developing a basic understanding of the regulatory requirements for a treatment, storage, and disposal facility;
- promoting understanding of policies and procedures necessary to protect human health and the environment;
- ensuring proper management of hazardous waste; and,
- educating employees regarding response to emergencies.

The outline for the RCRA training class will consist of the following elements:

- an introduction to RCRA, including a general description of RCRA and Hazardous and Solid Waste Amendments (HSWA); the definition of hazardous waste; waste generator requirements; treatment, storage, and disposal requirements; and labeling, inspection, record keeping, and reporting requirements;
- requirements associated with the RCRA permit for the Facility;
- Facility-specific waste management, including general procedures for receipt and handling of waste from off site as well as management of waste generated onsite;

- decontamination procedures;
- emergency procedures, including response to fires, explosions, and releases, and shutdown of operations;
- emergency equipment location and use;
- emergency systems- such as- the- communication and alarm systems and the fire suppression system;
- Contingency Plan;
- evacuation plan;
- waste minimization;
- occupational health and safety, including items such as personal protective clothing and equipment, general industrial safety, and employee Right-to-Know (the Hazard Communication Standard);
- transportation of hazardous waste, including marking, labeling, placarding, loading, use of shipping papers, record keeping, and other DOT requirements; and,
- maintenance of documentation.

Facility tours and audio-visual aids in conjunction with lectures and procedure manuals will be utilized in the classroom training. A written test will be administered at the completion of classroom training. A grade of 80 percent or better will be required to demonstrate mastery of the course material. The course curriculum will be reviewed at least annually by the RCRA training officer to ensure that it is current and appropriate.

7.2.1.2 Job-Specific Training

The RCRA classroom training will be supplemented with job specific training tailored to each employee's actual job responsibilities. Job specific training may include additional classroom training and/or OJT. All

employees who handle hazardous waste and supervisors of personnel who handle hazardous waste will be required to complete OJT. The purpose of OJT is not to demonstrate to personnel how to perform their duties, but rather to demonstrate how to perform their duties safely and in compliance with RCRA. OJT will be conducted in the work area by the line supervisor or foreman subsequent to classroom training. The length and complexity of the OJT will vary according to the employee's responsibilities. These minimum OJT sessions will be documented by both the employee and the supervisor by signing and dating a form. The form will also indicate the length of time spent on OJT training. The signed forms will be maintained as part of the Operating Record as discussed in Section 7.3.

A checklist developed by the work area supervisor will be used for job specific training. Prior to initial use of the checklist, it must be reviewed and approved by the RCRA training officer. All employees performing similar duties will have consistent job specific training. The job specific training checklist will be reviewed at least annually to ensure that it is current and appropriate for the subject job classification.

The job specific training checklist will include the following elements:

- information about procedures relevant to the individual's position, where these procedures are located, and which personnel have the authority to implement the procedures; key operating parameters and waste feed cut-off systems;
- location and use of communications or alarm systems;
- response to releases;
- emergency and routine shutdown of operations;
- Facility Contingency Plan and emergency procedures;
- evacuation procedures and location of emergency exits;
- response to leaks, spills, and overflows;
- Waste Analysis Plan procedures; and,
- inspection and maintenance procedures.

Based on the checklist, GMI will develop a training outline specifically for each job specific training program. The training programs specific to incident response positions, laboratory positions, waste handling positions, maintenance positions, emergency coordinators and site security officers are discussed below.

Incident Response Personnel

Specific classroom training and OJT for on-site individuals involved in incident response will focus on the emergency response equipment present at the facility. The training will address the use, maintenance, operation, purpose and limitations of the following specific equipment:

- fire-specific control equipment,
- personal protective equipment (PPE),
- spill control and decontamination equipment,
- emergency equipment,
- monitoring and communications equipment,
- shutdown operations,
- safety equipment,
- lock out/tag out program, and
- continuous air monitors.

Laboratory Personnel

Specific classroom training and OJT elements for laboratory personnel involved in analysis of hazardous waste will include:

- waste tracking procedures and profile forms,
- laboratory waste acceptance procedures,
- laboratory recordkeeping,
- waste pre-acceptance,
- waste discrepancy and rejection procedures,
- operation of onsite laboratory,
- proper analytical methods,
- laboratory quality assurance and quality control,
- laboratory safety and waste handling within the laboratory,
- laboratory and environmental monitoring equipment calibration,
- basic chemical concepts, and
- toxicology overview and exposure pathways.

Waste Handlers and Maintenance Personnel

Specific classroom training and OJT elements received by waste handlers and maintenance personnel will include:

- proper field sampling and testing procedures (waste handlers only),
- heavy equipment operations,
- waste handling precautions including chemical and physical hazards associated with each waste that will be handled onsite,
- drum and roll-off container handling,
- safety equipment,
- basic chemical concepts,
- hand and power tool safety and operation (maintenance personnel only),
- lock out/tag out procedures,

- waste compatibility issues,
- waste segregation procedures in storage and during treatment,
- storage area operations,
- waste treatment selection procedures,
- waste tracking procedures and profile forms,
- sampling recordkeeping procedure, and
- treatment data form procedure.

Emergency Coordinator

Specific classroom training and OJT elements for emergency coordinators will include:

- site emergency communications procedures,
- federal, state, and local agency emergency and all-clear notification procedures,
- qualitative and quantitative assessment of released materials,
- human health and environmental hazard recognition,
- release containment procedures,
- facility-wide fire, explosion, and leak detection procedures during emergency responses and normal operations,
- procedures for recovering, treating, storing, and disposing of recovered waste, soil, organic liquid, and water resulting from an emergency response,
- emergency equipment decontamination and reuse procedures,
- emergency response recordkeeping plan, and
- written reporting requirements to the agencies.

Site Security Officers

Specific classroom training and OJT elements for site security officers will include:

- procedures for controlling entry to the facility,
- maintaining overall facility security including perimeter fence inspections, and
- maintenance of all warning signs.

7.2.1.3 OSHA 40-Hour Training

All personnel who handle hazardous waste and the supervisors of personnel who handle hazardous waste will complete OSHA 40-hour training as required by 29 CFR 1910.120. It is anticipated that, at least initially, the OSHA 40-hour training will be provided by an outside vendor. Personnel who have documentation of course completion for the 40-hour and refresher training will not be required to retake the 40-hour training.

7.2.2 Training for Visitors

Visitors who are expected to be in the Facility for only a short period of time and who will not be handling hazardous waste will be provided a short briefing on basic emergency procedures such as decontamination, emergency signals and alarms, and evacuation routes. Visitors will not be allowed onsite unless they are escorted by Facility personnel or unless other arrangements have been made with Facility personnel. The briefing will include the following information:

- what hazards that may be encountered at the Facility;
- how emergencies are signaled or announced, how help is summoned , what information is to be given, and to whom the information is given;
- where to report during an emergency;
- how to safely evacuate from the Facility;
- what standard operating procedures for visitors are;
- where check-in/check out locations are; and,
- what safety equipment is required.

7.2.3 Training for Off Site Emergency Response Organizations

Training will be established for off site emergency response organizations through agreements with local agencies and contracts with vendors. This training will include, as appropriate, the following:

- site layout and site-specific hazards;
- the Contingency Plan;
- Facility emergency procedures;
- Facility decontamination procedures; and,
- appropriate response techniques.

7.3 RECORD KEEPING

In accordance with 40 CFR 264.16, records regarding job title, job description, training, and other appropriate documentation will be kept by the RCRA training officer.

7.3.1 Job Titles, Descriptions, and Duties

Job titles will be designated for each position at the Facility related to hazardous waste management and the name of each employee filling each job. Job descriptions will detail job duties and responsibilities for that position. The description will include the skills, education, and qualifications required for each position. A written description for each position will be maintained to determine the types and amounts of both introductory and continuing training to be given to each employee at the Facility.

7.3.2 Training Documentation

Records that document RCRA classroom training and OJT given to and completed by Facility personnel will be kept by the RCRA training officer. Training records on current employees will be kept until closure of the Facility. Training records on former employees will be kept for at least three years from the date the employee last worked at the Facility.

7.3.3 Other Documentation

Other documentation to be maintained at the Facility, includes the following:

- documentation of the annual review of the curriculum for RCRA classroom training;
- documentation of the annual review of the OJT checklists; and,
- RCRA classroom training test results.

Insert Figure 7-1, Facility RCRA Training Program