

PERMIT ATTACHMENT J PERSONNEL TRAINING

The primary objective of Rinchem Company Inc.'s (**RCI**) training program is to instruct employees in the practices, procedures and rules regarding safe operation and maintenance of the Container Storage Facility (**the Facility**) in accordance with applicable State and Federal regulations. The training program requires at least 24 hours training in safety, proper transport and response to hazardous waste emergencies. These classes are often conducted by RCI's training department, governmental agencies such as the EPA or DOE and/or outside training providers. The instruction is in the form of classroom instruction and on-the-job training. The training classes and program shall be updated as necessary to meet the regulatory requirements of New Mexico Hazardous Waste Management Regulations 20.4.1.500 NMAC, incorporating 40 CFR §264.16.

All new employees who manage hazardous waste shall complete the initial training courses within six months from their date of hire or from the date of transfer of job assignment. Personnel shall not work unsupervised in their positions until they have completed 24 hours of training. Annually, all personnel must participate in a minimum of eight hours of refresher/review of the initial training.

Courses which shall satisfy all or part of the training shall include, but not be limited to:

- Initial Facility Orientation
- OSHA 40-hr Emergency Response Technician
- OSHA 8-hr Refresher
- DOT Hazardous Materials Transportation Training

The following four Sections are some of the course contents that shall be covered during personnel training.

I. Initial Facility Orientation Course Contents

The key elements of the program shall include:

- Discussion of Emergency Preparedness Plan for the Facility,
- Hazard Identification and Discussion,
- Storage and Segregation,
- Contingency Plan and Emergency Procedures,
- Facility Tour,

- Identify Safety Features,
- Identify Communications and Alarm Systems,
- Discuss Evacuation Routes,
- Standard Operating Procedures,
- Review of Procedures to Perform Operations at Facility,
- Safety Practices,

The training shall consist of lectures, discussions, exercises, examinations and on-the-job training.

II - Example of OSHA's 40-Hour Emergency Response Technician Course Contents as required by 29 CFR 1910.120(q)

The key elements of the program include:

1. Emergency Response to Hazardous Materials Incidents,
2. Characteristics of Hazardous Wastes/Materials,
3. Information Resources,
4. Identification of Hazardous Waste,
5. Levels of Protection,
6. Chemical Protective Clothing,
7. Response Operations: Safety Plans and Standard Operating Procedures,
8. Response Operations: Size-up,
9. Response Operations: Strategy and Tactics,
10. Site Entry,
11. Incident Control: Confinement and Containment,
12. Direct-Reading Instruments,

13. Response Organization /Incident Command,
14. Level A Demonstration,
15. Decontamination,
16. Establish Incident Command for Transportation Incident,
17. Organize for Transportation Incident, and
18. The training shall consist of lectures, discussions, exercises and examinations.

III Example of OSHA 8-Hour Refresher Course Contents as per 29 CFR 1910.120

The key elements of the OSHA 8-hour Refresher training course contents program shall include:

- Hazardous Waste Management and Regulations,
- Sources of Information,
- Compatibility of Hazardous Wastes,
- Personal Protection,
- Principles of Safety, and
- Emergency Procedures.

The training shall consist of lectures, discussions, exercises and examinations.

IV Example of DOT Hazardous Materials Transportation Training Course Contents Covered as required under 49 CFR 172.700

The key elements of the program include:

- General Awareness/Familiarization,
- Identification of Hazardous Materials,
- Packaging,
- Marking,
- Labeling,

- Shipping Papers,
- Placarding,
- Separation and Segregation,
- Unique Moves,
- Safety, and
- Hazardous Waste Transportation Issues

The training shall consist of lectures, discussions, exercises and examinations.