

Attachment H

Personnel Training

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H. PERSONNEL TRAINING

H-1 RCRA Training Outline

A general outline of the content of the initial and continuing training program is as follows:

- A. **RCRA Regulation Purpose and Scope**
- B. **Hazardous Waste Identification**
- C. **Types of Generators**
- D. **Emergencies**
- E. **Training Requirements**

H-1a Job Title/Job Descriptions

The following sections list the functions and responsibilities of employees currently involved with the management of hazardous waste (F006) at the Greenbelt II Landfill (i.e., when hazardous waste is hauled to the Greenbelt II Landfill):

Landfill Operations and Maintenance Management

The employee(s) filling this function oversee the operations, inspections, and maintenance of the Greenbelt II Landfill. This employee(s) or their designee(s) must perform the functions pertaining to overall compliance with the approved RCRA permit.

Filter Cake Hauler

The primary responsibility of the employee(s) filling this function is to transport hazardous waste filter cake (F006) from the chrome treatment plant to the designated dump area at the Greenbelt II Landfill.

H-1b Training Content, Frequency and Techniques

Personnel who transport and handle F006 hazardous waste in the Greenbelt II Landfill must successfully complete the RCRA training program outlined in Section H-1 within six (6) months of assignment and take part in an annual refresher training. New employees will not be permitted to work unsupervised in hazardous waste handling positions until RCRA training has been satisfactorily completed. The RCRA training program may take the form of classroom

instruction, on-the job training, or web-based training. Records documenting initial RCRA training and annual refresher training are maintained at the facility.

H-1c Training Director

RCRA training is developed and provided under the direction of the Environmental Department. Personnel in the Environmental Department have been appropriately trained in hazardous waste management.

H-1d Relevance of Training to Job Position

RCRA training is the only method by which instruction specific to hazardous waste functions is provided. This training ensures that instruction is relevant to the responsibilities of the employee.

H-1e Training for Emergency Response

Personnel who respond to emergencies at the Midwest Plant are trained in accordance with OSHA requirements based on the nature of their response activities. The permittee's fire department personnel are the primary emergency responders and undergo regular fire training drills including OSHA 24-hour technician hazardous materials response training that allows first response, incident command and containment for emergencies. Emergency response personnel undergo OSHA 40-hour HAZWOPER training to ensure training is met for hazardous waste emergency coordination and aftermath remedial cleanup oversight activities, as needed.

H-2 Implementation of Training Program

Training will be successfully completed by relevant facility personnel within six months of their employment or assignment to the Greenbelt II Landfill or transfer to a new position related to the Greenbelt II Landfill, whichever is later. Employees will not work in unsupervised positions until after they have completed the training requirements. Records documenting that the required training has been provided to and completed by facility personnel will be maintained for a minimum of 3 years.