

ATTACHMENT 4
PERSONNEL TRAINING

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1.0 Introduction

Clean Harbors Aragonite has in-house training programs for all employees. All personnel receive a general orientation training including first aid and CPR. When personnel are assigned to their respective groups, they receive specific job related training. Until an employee is a qualified duty area operator, he/she must work under the supervision of a qualified area operator. All employees must successfully complete the courses in Table 2 prior to working unsupervised in the job title indicated.

Each department manager is responsible for the training and qualification of the individuals reporting to him/her. Overall coordination of the training program is the responsibility of the Human Resources Manager.

2.0 Outline of Training Program

2.0.1 Aragonite Personnel

All Clean Harbors Aragonite personnel will receive training as noted on Table 2. Also, non-Aragonite personnel assigned to an Aragonite manager to work under his/her direct supervision (temporary employees), will have the same training requirements as for Aragonite personnel. They will have job titles from the list in Table 2 and will be required to complete the training specified in Table 2.

The required training occurs within six months of date of hire or six months of assignment to Aragonite or within six months of a new position at Aragonite, whichever is later.

2.0.2 Non-Aragonite Personnel

Additionally, other personnel at the site will be required to receive a level of training consistent with their purpose at the site. These persons include contractors, Clean Harbors employees from corporate offices or from other facilities, visitors, and any others for whom training would be necessary. The following outlines the training required for these persons.

If the person will be working in areas where hazardous waste handling occurs, then the minimum required training will include courses 1301.1 (and 1301.1(R) or 1303.1-12 if applicable) and the Pre-project Environmental, Health, and Safety Review. If the person will be using an Aragonite forklift, then forklift training, course 1501.1, or a comparable course (and 1501.1(R) if applicable), is required.

Visitors who may be in areas where hazardous waste handling occurs are not required to have the training outlined above provided they are constantly escorted by an appropriately trained Aragonite employee. Other persons not working in areas where hazardous waste handling occurs will have training consistent with their task. The minimum training required for each person will be determined on a case-by-case basis. At a minimum, all contractors, visitors, and other non-Aragonite personnel will be required to receive basic orientation on the site, potential hazards and safety precautions, and evacuation procedures, prior to entering the site. This will be accomplished with an orientation film and documentation will be maintained by the guard.

2.1 Training Review

Some courses require an annual or triennial refresher, such as First Aid and CPR. Annual refresher courses must be taken in the same quarter of the following year of the initial training. That is, if the initial training was January 15, then the refresher training must be taken no later than the end of the first quarter. Refresher training in all topics on Table 1 occurs as noted.

2.2 Training Personnel Records

Records will be kept at the facility for examination by the State of Utah and the EPA. Included in these individual employee training records will be:

- Attendance record at training sessions
- Qualification cards and examinations
- Training received (Summary with title of course and date. Cross-indexed to course content file)
- Previous training and education, i.e., certifications, certificates

The minimum training record documentation is described in section 2.5.

Also, available on site, but not in each training folder, is the duty area roster by day, the organization chart, and the course content file.

2.3 Training Coordinator

The training coordinator for the Clean Harbors Aragonite facility is the Regulatory Training Specialist, who reports to the Health and Safety Manager.

2.4 Training for Emergency Response

The contingency plan is the basis for emergency response training. Training is coordinated by the Training Department.

2.5 Training Documentation

Training will primarily be documented on an attendance form. Other forms of documentation will be used (e.g., certificates of completion, computer printouts, etc.) when attendance rosters are not used (such as for self study programs). Each employee has a training file maintained by the Training Department, which contains all of the required documentation. Training records on current personnel must be kept until closure of the facility; training records on former employees must be kept for at least three years from the date the employee last worked at the facility.

To ensure that the training program is effective and people are properly trained, exams or other measures of competency are used. If a person fails the exams or otherwise does not meet the minimum requirements of the training course, additional training will be required before the person is considered to have completed the course.

The following outlines the requirements for documenting compliance with the training requirements for non-Aragonite personnel.

Since the Pre-project Environmental, Health, and Safety Review is specific to the Aragonite facility, this training will be conducted by the facility and records will be maintained on site documenting successful completion of the review for each person. However, other training may be completed at other locations.

For transient goods and services contractors who have received applicable training at other locations, the employer will provide a letter certifying that this training has been completed by each of the employees that will be working at the facility. This letter will be kept on site. Additionally, if requested by the Director, Clean Harbors Aragonite will acquire the records of training for specific individuals to demonstrate that the required training has indeed been completed.

Training records for Clean Harbors personnel who are not permanently assigned to the Aragonite facility will be provided upon request. When working in areas where waste handling occurs, they will be assigned a job title from Table 2 and the training specified in that table will be required.

For other persons not working in areas where hazardous waste handling occurs, if training in the courses listed in Table 1 is required, this will be documented and the records of successful completion of the required training will be provided upon request.

Table 1 - List of Courses			
Course Title	Course ID	Duration	Frequency
OSHA 29 CFR 1910.120	1301.1	24 hr	Initial
OSHA 29 CFR 1910.120 Refresher	1301.1(R)	7 - 8 hr	Annual
OSHA 29 CFR 1910.120 Refresher (Monthly Modules)	1303.1-12	0.5 - 1 hr each	Annual ¹
First Aid	1203.1	2 - 2.5 hr	Triennial
CPR	1203.2	3.5 - 4 hr	Annual
Permit Training	1401.1	9 - 10 hr	Initial
Permit Training Refresher	1401.1(R)	0.5 - 1 hr	Annual
General Employee Training			
• Site Orientation	1101.1	1 - 1.5 hr	Initial
• Industrial Safety	1102.1	1 - 1.5 hr	Initial
• Fire Prevention	1103.1	1 - 1.5 hr	Initial
• Contingency Plan	1104.1	1 - 1.5 hr	Initial
Annual Refresher			
• Site Orientation Refresher	1101.1(R)	≈ 0.25 hr	Annual
• Industrial Safety Refresher	1102.1(R)	≈ 0.25 hr	Annual
• Fire Prevention Refresher	1103.1(R)	≈ 0.25 hr	Annual
• Contingency Plan Refresher	1104.1(R)	≈ 0.25 hr	Annual
Compressed Gases	1202.2	≈ 0.5 hr	Initial
Venting Lines	1202.3	≈ 0.5 hr	Initial
Standard/Dual Wheel Forklift	1501.1	6 – 8 hr	Initial
Standard/Dual Wheel Forklift Refresher	1501.1(R)	≈ 1 hr	Annual
Confined Space	1202.1	2 - 2.5 hr	Initial
Confined Space Refresher ²	1202.1(R)	≈ 1 hr	Annual
Laboratory QC	1202.4	2 hr	Initial
Laboratory Safety	1202.5	2 hr	Initial
Incinerator Operator Qualifications	10		Initial
Control Board Operator Qualifications	11		Initial
Material Handler Qualifications	12		Initial

Notes:

- 1 At a minimum, 8 of 12 modules are to be completed annually, if employee is taking the OSHA 29 CFR 1910.120 refresher monthly modules.
- 2 Only for those employees who actually fill out a confined space permit. Otherwise, refresher is part of OSHA 29 CFR 1910.120 refresher.

3.0 Job Titles and Duties

This section outlines the plant organization and required training.

The job titles for the Aragonite site are listed in Table 2. These job titles correlate to job descriptions, which can be found in the Job Description Notebook available from the Human Resources Manager. Table 2 lists the required training at the facility. A current organization chart is available on-site from Human Resources. The chart specifies by name which person fills what job title.

For control board operators, incinerator operators, and material handlers, different training may be required depending on the duty area they are filling. The shift supervisor in incineration maintains the daily duty roster in his/her area to document which person is filling what duty area per day. A duty roster is also maintained listing which duty area(s) each material handler fills each day.

3.1 Relevance of Training to Job Position

All employees receive general employee training designed to focus on the overall purpose of the Clean Harbors Aragonite facility.

Employees with specific assignments under the same job title (control board operators, incinerator operators, and material handlers) receive training unique to their area of responsibility. Specific course and On-the-Job training requirements are defined in each position's Training Program Description. Each Training Program Description outlines the administrative and technical training requirements for each given duty area. In addition, this Training Program Description contains guidance to ensure all aspects of this Training Program are carried out effectively and consistently. The Training Program Descriptions are available for review on-site.

For the incinerator operators, control board operators, and material handlers, there are specific duty areas to which they may be assigned. These may change from day-to-day. The training requirements for a person to be able to fill specific duty areas are specified in the Training Program Description. No person may work unsupervised in one of these duty areas without having completed the associated required training.

Cross-training is available to enhance career advancement and understanding of the entire incineration system.

Courses described in this section are related to safety and waste handling and are offered to promote compliance with regulations and to aid in loss-time prevention.

Annually, the Managers will review the training program with the Vice President and General Manager. The annual review will consist of evaluating faculty and courses to determine their relevancy and quality. Adjustments will be made as warranted.

Table 2 - Required Training

JOB TITLE	COURSES
The following are administrative support jobs that do not have any contact with hazardous waste:	
Executive Secretary, Secretary, Office Coordinator, Compliance Document Coordinator, Regional Accounting Manager, Accountant, Accounting Supervisor, Accounting Clerk, Collections Clerk, Human Resources Manager, Human Resources Coordinator, Human Resources Supervisor, Operations Coordinator, Clerk, Purchasing Manager, Purchasing Agent, Document Control Coordinator, Outbound Residue Coordinator, Customer Service Representative, Customer Solutions Manager, Receptionist, Training Manager, Regulatory Training Specialist, Public Relations Manager, General Helper	1203.1, 1203.2, 1101.1, 1102.1, 1103.1, 1104.1, 1101.1(R), 1102.1(R), 1103.1(R), 1104.1(R)
The following are technical support jobs that have potential to work around hazardous waste:	
Vice President and General Manager, Compliance Manager, Health & Safety Manager, Health & Safety Engineer, Operations Manager - Incineration, Incinerator Superintendent, Operations Manager - Drum Production, Operations Manager, Maintenance Manager, Engineering Manager, Permitting Manager, Maintenance Planner, Draftsperson, Plant Engineer, Environmental Engineer, Senior Environmental Engineer, Process Engineer, Senior Process Engineer, Project Engineer, Senior Project Engineer, Inventory Control Coordinator, Waste Receiving Manager, Production Engineer, Operations Engineer, Senior Operations Engineer, Technical Manager, Quality Control Manager, Regulatory Compliance Specialist, Waste Acceptance Specialist, Customer Service Manager, Technical Sales Representative, Lead Programmer Analyst, Programmer Analyst, IT & Systems Manager, PC Technician, Laboratory Documentation Specialist, Production Coordinator, Logistics Coordinator, Material Router, Business Manager, Operations Support Supervisor	1301.1, 1301.1(R) or 1303.1-12, 1203.1, 1203.2, 1401.1, 1401.1(R), 1101.1, 1102.1, 1103.1, 1104.1, 1104.1(R)
The following are jobs that routinely work around hazardous waste:	
Incineration Supervisor, Incinerator Supervisor	1301.1, 1301.1(R) or 1303.1-12, 1203.1, 1203.2, 1401.1, 1401.1(R), 1101.1, 1102.1, 1103.1, 1104.1, 1104.1(R), 1202.2, 1202.3, 1501.1, 1501.1(R), 1202.1, 1202.1(R)
Incinerator Operator	1301.1, 1301.1(R) or 1303.1-12, 1203.1, 1203.2, 1401.1, 1401.1(R), 1101.1, 1102.1, 1103.1, 1104.1, 1104.1(R), 1202.2, 1202.3, 1501.1, 1501.1(R), 1202.1, 1202.1(R), 10

JOB TITLE	COURSES
Control Board Operator	1301.1, 1301.1(R) or 1303.1-12, 1203.1, 1203.2, 1401.1, 1401.1(R), 1101.1, 1102.1, 1103.1, 1104.1, 1104.1(R), 1202.2, 1202.3, 1501.1, 1501.1(R), 1202.1, 1202.1(R), 11
Operations Supervisor - Maintenance	1301.1, 1301.1(R) or 1303.1-12, 1203.1, 1203.2, 1401.1, 1401.1(R), 1101.1, 1102.1, 1103.1, 1104.1, 1104.1(R), 1202.2, 1202.3, 1501.1, 1501.1(R), 1202.1, 1202.1(R)
Operations Supervisor - I/E	1301.1, 1301.1(R) or 1303.1-12, 1203.1, 1203.2, 1401.1, 1401.1(R), 1101.1, 1102.1, 1103.1, 1104.1, 1104.1(R), 1202.2, 1202.3, 1501.1, 1501.1(R), 1202.1, 1202.1(R)
Waste Receiving Superintendent	1301.1, 1301.1(R) or 1303.1-12, 1203.1, 1203.2, 1401.1, 1401.1(R), 1101.1, 1102.1, 1103.1, 1104.1, 1104.1(R), 1202.1, 1202.1(R), 1202.2, 1202.3
Operations Supervisor	1301.1, 1301.1(R) or 1303.1-12, 1203.1, 1203.2, 1401.1, 1401.1(R), 1101.1, 1102.1, 1103.1, 1104.1, 1104.1(R), 1202.2, 1202.3, 1501.1, 1501.1(R), 1202.1, 1202.1(R)
Material Handler	1301.1, 1301.1(R) or 1303.1-12, 1203.1, 1203.2, 1401.1, 1401.1(R), 1101.1, 1102.1, 1103.1, 1104.1, 1104.1(R), 1202.2, 1202.3, 1501.1, 1501.1(R), 1202.1, 1202.1(R), 12
Chemical Handler	1301.1, 1301.1(R) or 1303.1-12, 1203.1, 1203.2, 1401.1, 1401.1(R), 1101.1, 1102.1, 1103.1, 1104.1, 1104.1(R), 1202.2, 1202.3, 1501.1, 1501.1(R), 1202.1, 1202.1(R)
Lab Pack Operator	1301.1, 1301.1(R) or 1303.1-12, 1203.1, 1203.2, 1401.1, 1401.1(R), 1101.1, 1102.1, 1103.1, 1104.1, 1104.1(R), 1202.2, 1202.3, 1501.1, 1501.1(R), 1202.1, 1202.1(R), 12
Maintenance Supervisor	1301.1, 1301.1(R) or 1303.1-12, 1203.1, 1203.2, 1401.1, 1401.1(R), 1101.1, 1102.1, 1103.1, 1104.1, 1104.1(R), 1202.2, 1202.3, 1501.1, 1501.1(R), 1202.1, 1202.1(R)
Laboratory Manager	1301.1, 1301.1(R) or 1303.1-12, 1203.1, 1203.2, 1401.1, 1401.1(R), 1101.1, 1102.1, 1103.1, 1104.1, 1104.1(R), 1202.2, 1202.4, 1202.5
Operations Supervisor - Laboratory	1301.1, 1301.1(R) or 1303.1-12, 1203.1, 1203.2, 1401.1, 1401.1(R), 1101.1, 1102.1, 1103.1, 1104.1, 1104.1(R), 1202.2, 1202.4, 1202.5
Laboratory Supervisor	1301.1, 1301.1(R) or 1303.1-12, 1203.1, 1203.2, 1401.1, 1401.1(R), 1101.1, 1102.1, 1103.1, 1104.1, 1104.1(R), 1202.2, 1202.4, 1202.5
Chemist	1301.1, 1301.1(R) or 1303.1-12, 1203.1, 1203.2, 1401.1, 1401.1(R), 1101.1, 1102.1, 1103.1, 1104.1, 1104.1(R), 1202.2, 1202.4, 1202.5
Laboratory Technician	1301.1, 1301.1(R) or 1303.1-12, 1203.1, 1203.2, 1401.1, 1401.1(R), 1101.1, 1102.1, 1103.1, 1104.1, 1104.1(R), 1202.2, 1202.4, 1202.5
Driver	1301.1, 1301.1(R) or 1303.1-12, 1203.1, 1203.2, 1401.1, 1401.1(R), 1101.1, 1102.1, 1103.1, 1104.1, 1104.1(R), 1501.1, 1501.1(R), 1202.1, 1202.1(R)

JOB TITLE	COURSES
Maintenance Technician	1301.1, 1301.1(R) or 1303.1-12, 1203.1, 1203.2, 1401.1, 1401.1(R), 1101.1, 1102.1, 1103.1, 1104.1, 1104.1(R), 1202.2, 1202.3, 1501.1, 1501.1(R), 1202.1, 1202.1(R)
Security Guard	1301.1, 1301.1(R) or 1303.1-12, 1203.1, 1203.2, 1101.1, 1102.1, 1103.1, 1104.1, 1101.1(R), 1102.1(R), 1103.1(R), 1104.1(R)