

PERSONNEL TRAINING PLAN

**NORLITE LLC
COHOES, NEW YORK
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PREPARED FOR:

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PERSONNEL TRAINING PLAN

1.0 OUTLINE OF TRAINING PROGRAM

The purpose of this Personnel Training Plan is to describe the facility's training program for all personnel whose job responsibilities include hazardous waste management to ensure compliance with the requirements of 6 NYCRR Part 373-2.2(h). This Personnel Training Plan is incorporated by reference into the Part 373 Permit for the Norlite LLC facility. In the event that changes are made to the facility that affects the content of this plan, this plan will be updated in accordance with the requirements of Condition D of Module 1.

1.1 Job Titles and Duties

The following positions at the facility are related to hazardous waste management:

Job Title	Duties/Description
Plant Manager	Responsible for all of Norlite's Operations Supervises the development and technical support of the LLGF Program Supervises Section Managers Interact with regulatory agencies and technical consultants Member of Safety and BMP Committees Keep abreast of regulatory changes Emergency Coordinator
Plant Engineer	Supervises or performs professional engineering for the LLGF Program Researches and provides specifications for replacement and new facility equipment Writes and/or reviews technical engineering reports Interprets and applies federal, state, and local laws when applying professional engineering principles and practices. Emergency Coordinator

Environmental Manager	<p>Coordinate all environmental compliance activities</p> <p>Keep abreast of regulatory changes</p> <p>Member of Safety and BMP Committees</p> <p>Interacts with regulatory agencies and technical consultants</p> <p>Assists with safety and regulatory training</p> <p>Emergency Coordinator</p>
Safety Manager	<p>Coordinates and maintains overall facility safety programs</p> <p>Coordinates training of all personnel with regards to hazardous waste operations</p> <p>Maintains personnel training records</p> <p>Coordinates medical surveillance program</p> <p>Member of Safety and BMP Committees</p> <p>Emergency Coordinator</p>
Maintenance Manager	<p>Develop and implement a preventative maintenance plan</p> <p>Planning, organizing, and directing plant maintenance and repair work</p> <p>Supervise plant technicians</p> <p>Inspects and evaluates mechanical and electrical components of facility</p>
Kiln Supervisor	<p>Supervise Kiln Field Operators, Burner Operators, Wastewater Treatment Plant Operator, and Mechanics</p> <p>Member of Safety and BMP Committees</p> <p>Conducts daily inspections of Fuel Farm and Kiln areas</p> <p>Completes security checks of facility</p> <p>Designated Emergency Contact</p>
Lab Manager	<p>Responsible for all laboratory operations</p> <p>Communicates with all departments within the facility and scheduling of laboratory responsibilities</p> <p>Supervises Lab Technicians</p> <p>Member of Safety and BMP Committees</p>
Lab Technician	<p>Provides all analytical support for the lab</p> <p>Daily maintenance and cleaning of lab instrumentation</p>
Fuel Farm Manager	<p>Supervises LLGF unloading/transfer operations</p> <p>Coordinates drum processing activities</p> <p>Responsible for overall housekeeping activities in Fuel Farm area</p>
Kiln Field Operator	<p>Assist Burner Operator with kiln operations</p> <p>Daily maintenance of kiln equipment</p>
Burner Operator	<p>Responsible for kiln operating within all parameters of Automatic Waste Feed Cut Off System (AWFCO)</p> <p>Responsible for production of lightweight aggregate</p>
Wastewater Treatment Operator	<p>Monitors and operates the Wastewater Treatment Facility</p> <p>Performs repairs to related piping and pumping systems</p> <p>Conducts routine chemical analysis of wastewater</p>
Mechanic	<p>Maintain, repair, and overhaul facility equipment.</p>

Runner	Maintain stockroom to ensure adequate supply of replacement equipment Provide support in getting materials needed for plant activities
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Personnel will complete introductory training relevant to their job title/position within six months of their employment or assignment to a new position. Employees will not work in unsupervised positions until they have completed the training required for their respective position.

Personnel take part in continuing education (refresher) training annually relevant to their job title/position.

1.2 Relevance of Training to Job Position

All employees working within the plant will undergo initial, specialized, specific and annual training programs, depending upon their job positions. This will be accomplished via classroom, hands-on, and specific on-the-job training, to ensure compliance with 373-2.2 (h) (1) (i), as it is relevant to their positions. Supervisors and managers will attend training sessions on proper handling and management of hazardous waste materials. A qualified instructor, as per 373-2.2 (h) (1) (ii) will conduct all training programs. Training sessions are designed to cover safety, compliance and health procedures related to activities and procedures at this facility, and follow the requirements of 29CFR, 30CFR, 40CFR, 49CFR, and 373-2.2 (h) (1) (iii), as they apply to the Norlite facility.

Except for on-the-job training, the training occurs off-site in a classroom setting to avoid distraction. The topics included are:

Orientation A 20-minute video overview of basic plant operations and safety regulations. Completed during the first day of employment. A requirement for all individuals working at the facility.

24-Hour Initial Classroom and practical training covering safety and regulatory requirements for working within a mining and a TSD/RCRA facility. This

is conducted prior to working without direct supervision and is a conducted only upon initial employment.

Initial

Supervisory

Classroom and practical training to be given after 24-hour initial training. It is designed for supervisory personnel to ensure compliance with RCRA regulations, including compliance, emergency response, and review of the contingency plan.

Emergency

Response

Classroom and practical training designed to prepare individuals to properly report and handle releases of hazardous materials. A refresher is completed annually.

Standard

Operating

Procedures

Classroom and practical training covering standard operating procedures (SOP's) relevant to the job titles and duties. This is conducted during initial training and will be updated as needed.

CPR/First- Aid

Classroom and practical training covering CPR and first aid for personnel responding to a medical emergency. Refresher training is conducted every two years or as required.

8-Hour Refresher

8-hour classroom and practical training serving as a “refresher” to 24-hour initial training. Basic safety procedures are reviewed in addition to covering any new regulations or procedures. This is completed annually.

DOT

Classroom training covering proper labeling, handling, shipping, and transportation of hazardous materials. Refresher training is given annually.

1.3 Training Content, Frequency and Techniques

The facility's training programs consist of introductory and continuing education training programs for personnel relevant to their job title/position. The training programs consist of a combination of classroom instruction and on-the-job training including instruction on hazardous waste management procedures to enable employees to responsibly perform their job-specific duties. In addition, the training programs are designed to ensure that facility personnel are familiar with the implementation of the facility's Integrated Contingency Plan and are able to respond effectively to emergencies.

Facility personnel successfully complete the training required for their job-specific position within six months after the date of their employment or assignment to the facility. Employees are not allowed to work in unsupervised positions until they have completed the training required for their position. Facility personnel take part in an annual review of the initial training relevant to their position.

An outline of the training programs is provided in Exhibit A of this Personnel Training Plan.

1.4 Training for Emergency Response

At least twenty (20) plant employees will be trained in response to spills in order to mitigate groundwater contamination. These individuals will only respond after training is completed. Each will be trained at the appropriate level of response and will participate in refresher training. Emergency response training is described in the Training Outline in Exhibit A.

1.5 Training Director

The Training Director is the Safety Manager, a Norlite LLC employee, who is responsible for overseeing the design and implementation of the training program. At the completion of initial training and each annual course, the Training Director certifies that each employee has successfully completed the program. Training may also be conducted by a reputable outside firm experienced in the appropriate training courses (HAZWOPER, DOT, etc).

The current Safety Manager is Robert Milburn. His qualifications include the following.

- BS in Occupation Safety & Health Engineering
- Certified Mine Safety Professional
- Trained to provide Leadership Training
- Certified in OHSAS 18001 Internal Auditing
- Member of the International Society of Mine Safety Professionals
- Member of the American Society of Safety Engineers
- Trained Emergency Medical Technician
- 40 Hour HAZWOPER
- 24 MSHA Training
- First Aid/CPR Training
- Trained as an MSHA Instructor

2.0 IMPLEMENTATION OF TRAINING PROGRAM

All current employees of the facility have been fully trained. All future employees will complete their training within 6 months of their employment or assignment to any hazardous waste emergency response function or hazardous waste management activity. New employees are not permitted to work unsupervised until they have completed the training program.

The Training Director maintains required training records and shall make them available to the Department upon request. These files identify the employee name, job title, education, and

years of service and include copies of certificates documenting successful completion of training courses.

Norlite LLC will maintain the following records at the facility for each position related to hazardous waste management:

- Job titles and names of employees filling each job position;
- Written job descriptions;
- Written description of type and amount of training given to each position;
- Documentation that training has been given to and completed by facility personnel, both for initial training and the subsequent annual refreshers; and
- Records that document that the training has been given to, and completed by, facility personnel.

Training records will be maintained for current personnel until closure of the facility. Training records for former personnel will be kept for a minimum of three years after the last date of employment.

3.0 GLOSSARY

<u>Term</u>	<u>Definition</u>
6 NYCRR	Title 6 of the New York Codes, Rules and Regulations
DOT	United States Department of Transportation
HAZCOM	HAZard COMmunication
HazMat	Hazardous Materials
HAZWOPER	HAZardous Waste OPerations and Emergency Response
ICP	Integrated Contingency Plan
LDR	Land Disposal Restriction
LP	Liquid Propane
MSDS	Material Safety Data Sheets
NYSDEC	New York State Department of Environmental Conservation
NYSDOH	New York State Department of Health
OSHA	Occupational Safety and Health Administration
PPE	Personal Protective Equipment
QA/QC	Quality Assurance/Quality Control
RCRA	Resource Conservation and Recovery Act
TSCA	Toxic Substances Control Act

Exhibit A

A. Outline for Introductory Training Program

a. Occupational Safety and Health Administration(OSHA) HAZardous Waste Operations and Emergency Response (HAZWOPER) (40-hour course)

- i. Worker protection regulations (OSHA 1910.120)
- ii. Safety Considerations/Principles
- iii. Hazard Recognition and Evaluation
- iv. Chemical Hazards
- v. Terminology
- vi. Toxicology
- vii. Hazard Communication
- viii. Personal Protection Equipment
 1. Levels of protection
 2. Respiratory protection
 3. Protective clothing
- ix. Drum Handling Procedure
- x. Emergency Response

b. Resource Conservation and Recovery Act (RCRA)

- i. Regulatory History
- ii. Laws and Regulations Governing Hazardous Waste Management
- iii. Hazardous Waste Identification
 1. Listings
 2. Characteristic codes
 3. State codes
- iv. Paperwork Requirements

c. Manifest Training

- i. History and Purpose
- ii. Manifest Fields
- iii. Discrepancies and Rejections
- iv. Distribution Summary
- v. Profile Sheets (Lab Pack and Containerized Waste)
- vi. Packing Slips
- vii. Land Disposal Restrictions (LDRs)
- viii. Exception Reporting
- ix. Recordkeeping

d. United States Department of Transportation (DOT) Hazardous Materials (HazMat) General Awareness

- i. Training Requirements
 1. Hazmat Employees
 2. Training Frequency
- ii. Hazard Class Definitions
- iii. Shipping Names
- iv. Packaging
- v. Marking/Labeling
- vi. Shipping Papers

- vii. Placarding
- viii. Loading/Segregation
 - 1. Segregation chart
 - 2. Exemptions
 - 3. Handling, loading, unloading, securing and storing hazardous materials
- ix. Operating a HazMat vehicle
 - 1. Reporting issues
 - 2. Contingency plan
- e. **Hazardous Materials Security General Awareness**
- f. **DOT HazMat Security Plan-In-Depth**
 - i. Regulatory Requirements
 - ii. Vulnerability Assessment
 - iii. Risks
 - 1. Theft
 - 2. Hijacking
 - 3. Materials stored at the facility
 - iv. Personnel Security
 - v. Unauthorized Access
 - vi. En Route Security
 - vii. Sensitive Communications
- g. **Facility Orientation**
 - i. Facility History and Permits
 - 1. History of the facility
 - 2. Part 373 Permit
 - 3. Toxic Substances Control Act (TSCA) authorization
 - ii. Waste Acceptance Procedures
 - 1. Work sheets
 - 2. Paperwork approval
 - 3. Quality Assurance/Quality Control (QA/QC) of waste
 - 4. Resolution of Discrepancies
 - iii. Storage of Materials within the Facility
 - 1. Rack storage
 - 2. Vault storage for ignitable and reactive wastes
 - 3. Segregation of incompatible wastes
 - 4. Liquid propane (LP) storage
- h. **Safety Orientation**
 - i. Safety Orientation
 - 1. Introduction
 - 2. Facility rules
 - 3. Emergency Action and Fire Prevention Plan
 - 4. Fire extinguisher awareness
 - 5. Incident/injury investigation and reporting
 - ii. Personal Protective Equipment (PPE)
 - 1. Eye and face protection
 - 2. Head protection

3. Foot protection
4. Hand protection
5. Hearing protection
6. Personal protection levels
- iii. Respiratory Protection
- iv. Blood borne Pathogens
- v. HAZard COMMunication Program (HAZCOM)
 1. Purpose of HAZCOM
 2. Material Safety Data Sheets (MSDSs)
 3. Vendor safety
 4. Labeling
 5. Review of chemicals at facility
- vi. Back Safety
- vii. Contingency Plan
 1. Emergency and evacuation procedures
 - a. Response to fires or explosions
 - b. Response to groundwater contamination incidents
 - c. Shutdown of operations
 - d. Key parameters for automatic waste feed cutoff systems
 2. Location of emergency equipment and PPE
 3. Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment
 4. Emergency Coordinators and notification numbers

B. Outline for Continuing Education Program

a. OSHA 8-Hour Refresher (this course is required annually)

- i. Regulatory Update
- ii. Hazard Recognition and Evaluation
- iii. Review of Levels of Personal Protection
 1. Chemical protective clothing
 2. Respiratory protection
 3. Selection and use

b. Facility Refresher (this course is required annually)

- i. Waste Characterization and Identification, Waste Acceptance Procedures, Commingling Wastes, Segregation of Incompatible Wastes
- ii. Emergency Response Procedures / Integrated Contingency Plan Review
- iii. Mock Emergency Drill

c. RCRA (this course is required annually)

- i. Regulatory Updates
 1. Laws and regulations governing hazardous waste management and disposal
- ii. Hazardous Waste Identification
 1. Listings
 2. Characteristic codes
 3. State codes
- iii. Paperwork Requirements