

**SYSTECH ENVIRONMENTAL CORPORATION
TULSA, OKLAHOMA**

PERMIT ATTACHMENT 4

TRAINING PLAN

SECTION H - TRAINING PLAN

TABLE OF CONTENTS

- 1.0 Purpose and Scope 2
 - 1.1 Facility Operations Covered by this Plan..... 2
- 2.0 Job Title and Descriptions 2
- 3.0 Training Content, Frequency and Techniques..... 3
 - 3.1 Initial Training Period..... 3
 - 3.2 On-the-Job Training..... 3
 - 3.3 Continuing Training - Annual Review 3
- 4.0 Training Director..... 3
- 5.0 Relevance of Training to Job Position 4
- 6.0 Training for Emergency Response 4
- 7.0 Implementation of Training Program 4

LIST OF ATTACHMENTS:

- ATTACHMENT H-1 SYSTECH TRAINING PROGRAM OUTLINE
- ATTACHMENT H-2 TRAINING REQUIREMENTS

SECTION H - PERSONNEL TRAINING

1.0 PURPOSE AND SCOPE

In accordance with 40 CFR 264.16, 40 CFR 270.14(b)(12), and O.A.C. 252:205-3-2(f), Systech has developed introductory and continuing training programs including classroom and on-the-job instruction that teaches employees to perform their duties in a way that ensures the facility's compliance with all requirements. All employees undergo general RCRA training to identify, evaluate, and control safety and health hazards and to provide emergency response procedures for facility personnel to follow in emergency situations.

This section outlines the initial and continuing training Systech employees receive. Both classroom instruction and on-the-job training (OJT) are used to train personnel in hazard recognition, job content and responsibilities, engineering safety controls, the use of personal protective equipment, emergency response procedures, medical surveillance policy, recognition of symptoms of illness, and sources of medical assistance. These training components provide personnel with a level of training directly related to their level of responsibility and their specific job functions.

An outline of the contents of the classroom training sessions is presented in Attachment H-1. A training manual covers the material presented in the classroom training sessions and is available for review at the facility.

1.1 Facility Operations Covered by this Plan

Systech is located in Rogers County, Oklahoma, northeast of the City of Tulsa. The Systech property is located within the CPCC cement plant operations as it prepares fuel quality wastes (FQW) for combustion in the CPCC cement kilns. The Systech facility consists of two (2) FQW storage and blending tanks, a truck bay that can unload and store two tankers plus a few drums of waste, and a laboratory/office building.

The Systech Tulsa facility receives Fuel Quality Waste (FQW) primarily from other Systech fuel blending locations, but also has the capability to receive similar wastes from other generators. The FQW is received, tested, unloaded, blended and pumped to the CPCC cement kilns to be used directly in the plant's cement manufacturing process. All fuels are compatible with the process of cement manufacturing. The equipment used to contain and convey this hazardous material is regulated by the RCRA hazardous waste regulations.

2.0 JOB TITLE AND DESCRIPTIONS

The job title, job description, and name of each employee filling positions related to hazardous waste management are kept on file at the facility. Job descriptions include educational and other necessary qualifications as well as the assigned duties for each position.

3.0 TRAINING CONTENT, FREQUENCY AND TECHNIQUES

This section and Attachment H-2, Training Requirements, describe the training employees receive. While all job titles included in this table may not exist at the Systech Tulsa facility, the responsibilities will be incorporated into positions that do exist, and the personnel performing those responsibilities will be provided the indicated training.

3.1 Initial Training Period

All newly hired, transferred, or cross-training personnel receive instruction and OJT relating specifically to their assigned duties within six months of their assignment to the waste management positions.

The initial training consists of 24 to 40 hours of instruction using a variety of methods and presentation materials to describe the waste-derived fuel program, discussions of material safety data, information on the characteristics and handling of waste materials, and safe work practices. OJT continues after the initial training is completed. Employees are not allowed to work unsupervised with hazardous waste until they have completed sufficient training to ensure that they can safely perform assigned duties in compliance with the applicable hazardous waste management requirements. The initial training may also include Mine Safety and Health Administration (MSHA) topics.

3.2 On-the-Job Training

The mastery of specific skills or procedures is accomplished through supervised OJT activities. Supervisory personnel observe and evaluate the performance and competence of the trainees over the course of their employment.

3.3 Continuing Training - Annual Review

After the first year, facility personnel attend approximately eight hours of annual refresher training. This program includes an abbreviated review of the introductory training outline (see Attachment H-1 for a subset of the topics), coupled with a detailed review of emergency response procedures contained in the Contingency Plan. It may also contain information relating to health and safety as required by the MSHA.

Emphasis is placed on discussions of how any changes in wastes, equipment, operations, procedures, or regulations affect the Contingency Plan and emergency response activities. Additionally, question and answer opportunities allow for discussion of any operational concerns, difficulties, malfunctions, or incidents that have occurred in the past year.

4.0 TRAINING DIRECTOR

The Systech Site Manager or their designee coordinates training activities for facility personnel. The Site Manager and experienced personnel coordinating OJT activities are trained in FQW management procedures.

5.0 RELEVANCE OF TRAINING TO JOB POSITION

The entire training program prepares personnel to manage the wastes received safely and efficiently. In addition, OJT provides more intensive training and experience in daily waste handling operations related to each employee's duties. Attachment H-2 identifies the type of OJT each position requires and the RCRA training that employees attend.

6.0 TRAINING FOR EMERGENCY RESPONSE

Facility personnel receive training in implementing the Contingency Plan, both during initial training and during the annual review. They are familiar with emergency procedures, equipment, and systems, and will be able to respond promptly and safely should the need arise.

The training program may include, but is not limited to, the following safety-related items:

- Procedures for using, inspecting, repairing and replacing, and awareness of facility emergency and monitoring equipment
- Key parameters for automatic waste feed cut-off systems.
- Communications and alarm systems
- Response to fires and explosions
- Shutdown of operations

7.0 IMPLEMENTATION OF TRAINING PROGRAM

Certain records relating to the training of FQW facility personnel are maintained at the facility. These records indicate that facility personnel have successfully completed training within six months of their employment or assignment to the facility or transfer to a new position that involves working with FQW within the facility. Employees do not work in unsupervised positions involving FQW until they have completed the training requirements.

The following items are maintained at the facility as part of the Operating Record.

- Job title for each position at the facility relating to FQW management, and the name of the employee(s) filling each position.
- Written job descriptions for each position, including the requisite skill, education, qualifications, and duties of the employees assigned to each position.
- Written description of the training.
- Records that document the appropriate training or job experience described above has been given to and completed by the facility personnel.

Training records on current personnel are kept for three years following closure of the facility. Training records on former employees are kept for at least three years from the date the employee last worked at the facility. Training documents for employees that are transferred to another Systech facility are transferred with the employee.

ATTACHMENT H-1 SYSTECH TRAINING PROGRAM OUTLINE

ATTACHMENT H-1 SYSTECH TRAINING PROGRAM OUTLINE

- Section I. What Is Fuel Quality Waste (FQW)?
 - A. Definition, Sources, and Standards
 - 1. Definition
 - 2. Standards
 - 3. Sources
 - 4. Labels/Placards
 - B. Basic Characteristics of FQW
 - 1. Vapors
 - 2. Ignitability
 - C. Hazards Associated with FQW
 - 1. Fire/Explosion
 - 2. Health Effects
- Section II. Cement Manufacturing (not annually reviewed)
 - Overview of cement manufacturing process
- Section III. Regulations, Permits, and Inspections (annually only major changes)
 - A. Government Regulations
 - B. Permits
 - C. Inspections and Audits
 - 1. External
 - 2. Internal
- Section IV. Waste Approval/Rejection Process
 - A. How Systech Qualifies New Customers
 - 1. Customer Requalification Policy
 - 2. Scheduling
 - 3. Analyses of Shipments
 - 4. Documentation
 - B. Rejection Policy
 - 1. Reasons for Rejecting FQW
 - 2. Notification Procedure
 - 3. What Happens to a Rejected Waste Shipment?

Section V. Health and Welfare Program

- A. Medical Examinations (initial training only)
 - 1. Pre-placement
 - 2. Annual
 - 3. Termination (Employee Option for examination)
- B. Monitoring Programs (annual review only if monitoring was done that year)
 - 1. Vapors and Dusts
 - 2. Noise
 - 3. Heat Stress
 - 4. Other Tests

Section VI. Basic Operations Training-Work Practices

- A. Personal Protective Clothing and Equipment
 - 1. The Need for Protective Clothing and Equipment
 - 2. Types of Protective Clothing and Equipment
 - 3. Care of Personal Protective Equipment
- B. Respirators
- C. Housekeeping, Maintenance, and Personal Hygiene
 - 1. Housekeeping
 - 2. Maintenance
 - 3. Personal Hygiene
- D. General Safety Procedures
 - 1. General Rules
 - 2. Equipment Safety
 - 3. Electrical Systems
- E. Lockout-tagout Procedures
- F. Semi-enclosed Space/Closed Space (Vessel) Entry Procedures
 - 1. Semi-enclosed Space Entry Procedures
 - 2. Closed Space/Vessel Entry Procedures

Section VII. Emergency Personnel

Section VIII. Contingency Plan

Section IX. Contingency Plan Review

Section X. Site Tour (initial only)

Section XI. Final Review (initial only)

ATTACHMENT H-2 TRAINING REQUIREMENTS

ATTACHMENT H-2 TRAINING REQUIREMENTS

POSITION	INITIAL CLASSROOM	ANNUAL REFRESHER	SAMPLINGOJT	OFFLOADING	MAINTENANCE	TANK MANAGEMENT	CONTAINERMANAGEMENT	LABORATORY	INSPECTIONS OJT	ADMINISTRATIVE	ANNUAL EMERGENCY RESPONSE DRILL
Site Manager	X	X							X	X	X
Production Supervisor	X	X	X	X		X	X		X	X	X
Maintenance Supervisor	X	X			X				X		X
Shift Supervisor	X	X	X	X		X	X		X		X
Maintenance Tech.	X	X			X				X		X
Process Operator	X	X	X	X		X	X		X		X
Customer Service Rep.	*	X								X	X
Administrative Assistant	*	*								X	X
Chemist.	X	X	X					X		X	X