

**TULSA CEMENT LLC
TULSA, OKLAHOMA**

**PERMIT ATTACHMENT 4
TRAINING PLAN**

SECTION H – TRAINING PLAN

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SECTION H – TRAINING PLAN

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), CPCC has developed introductory and continuing training programs including classroom and on-the-job (OTJ) instruction that teaches employees to perform their duties in a way that ensures the plant'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 plant personnel to follow in emergency situations. Additionally, maintenance and production employees involved in the sampling of CKD and maintenance on the burner pipe/FQW piping undergo specific on-the-job training as required. No other categories of CPCC employees are required to undergo any specific RCRA training as they either do not handle Fuel Quality Waste (FQW) or the training requirements related to their job have been superseded by training required by the HWC MACT regulations.

This section outlines the initial and continuing training CPCC employees receive. Both classroom instruction and 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 example outline of the contents of the classroom training sessions is presented in Attachment H-1.

1.1 Facility Operations Covered by this Plan

CPCC is located in Rogers County, Oklahoma, northeast of the City of Tulsa. The plant consists of a quarry operation, crushing system, two raw mills, two cement kilns, three finish mill systems, and cement storage silos.

The CPCC plant receives hazardous liquid waste-derived fuels, also known as fuel quality waste (FQW), from Systech Environmental Corporation (Systech). The FQW is used directly as fuel 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.

This permit application is to allow CPCC to thermally treat FQW for energy recovery. CPCC is not a permitted hazardous waste storage facility. The CPCC plant is also a Very Small Quantity Generator (VSQG) of hazardous waste. Training associated with the management of FQW prior to thermal treatment is regulated by 40 CFR 264.16(b). This regulation requires initial and annual refresher training for persons who manage FQW streams. Relevant personnel in this plant would include certain inspectors, those who obtain samples, those who are involved in the generation of hazardous waste, and maintenance employees tasked with burner pipe and FQW pipe maintenance. Training is recommended but not required for VSQG generators of hazardous waste. This training plan applies to personnel with job duties related to the management of FQW.

2.0 JOB TITLE AND DESCRIPTIONS

The job title, job description, and name of each employee filling positions related to FQW management are kept on file at the plant. 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.

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 permitted to work with FQW until they have completed sufficient training to ensure that they can safely perform assigned duties in compliance with the applicable hazardous waste management requirements.

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 training.

3.3 Continuing Training - Annual Review

After the first year and during a twelve-month period, plant personnel attend approximately eight hours of training. This program includes an abbreviated review of the introductory training outline (see Attachment H-1 or 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 Mine Safety and Health Administration (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 CPCC Plant Manager or their designee coordinates training activities for plant personnel. The Plant Manager and experienced personnel coordinating OJT activities are trained in hazardous waste 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 particular 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

Plant 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 includes the following safety-related items:

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

7.0 IMPLEMENTATION OF TRAINING PROGRAM

Records relating to the training of FQW plant personnel with responsibilities associated with the management of hazardous waste are maintained at the plant. These records indicate that plant personnel have successfully completed training within six months of their employment or assignment to the plant or transfer to a new position which includes involvement with FQW within the plant. Employees do not work in unsupervised positions involving FQW until they have completed the training requirements.

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

- Job title for each position at the plant 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 plant personnel.

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

ATTACHMENT H-1 CPCC TRAINING PROGRAM OUTLINE

CPCC Training Program Outline

- 1) Hazard recognition,
 - a) Hazard characteristics
 - i) Ignitability
 - ii) Corrosivity
 - iii) Reactivity
 - iv) Toxicity
 - b) What Is Fuel Quality Waste (FQW)?
 - i) Basic Characteristics of FQW
 - (1) Vapors
 - (2) Ignitability
 - ii) Hazards Associated with FQW
 - (1) Fire/Explosion
 - (2) Health Effects
- 2) Emergency response procedures,
 - a) Types of potential emergencies
 - i) Spill
 - ii) Fire
 - iii) Tornado
 - b) Contingency Plan
 - i) Response to incidents
 - ii) Communications or alarm systems
 - iii) Initial actions to fires or explosions
 - iv) Initial actions to spills
 - v) FQW operations shutdown
 - vi) Notifications
 - vii) Follow-up
 - c) Emergency evacuation procedures
 - d) Using, inspecting, and replacing plant emergency equipment
- 3) Waste minimization/pollution prevention.
 - a) Types of site-generated wastes

- b) Methods to reduce waste generation
- 4) Sampling waste streams;
 - a) Description of waste streams
 - i) Cement kiln dust
 - ii) Used refractory brick
 - b) Sampling procedures
 - c) Sample preparation and shipping;
- 5) Hazardous waste management requirements for VSQ generators (laboratory).
 - a) Manifesting
 - b) Packaging, labeling, marking, placarding
 - c) Accumulation time – satellite accumulation
 - d) Recordkeeping and reporting

OSHA 1910.120 HAZARDOUS WASTE OPERATIONS (HAZWOPER)

Employees managing hazardous materials and/or hazardous waste will receive HAZWOPER training. The amount of training based upon their job duties in relation to managing hazardous materials and hazardous waste. Records of the amount of training will be maintained in employee records.

ATTACHMENT H-2 TRAINING REQUIREMENTS

POSITION	INITIAL CLASSROOM	ANNUAL 8 HR REFRESHER	SAMPLING OJT	INSPECTIONS OJT	ANNUAL EMERGENCY RESPONSE DRILL
Shift Supervisor/Leadman	X	X	X	X	X
Maintenance/Production	X	X		X	X
Laboratory technician	X	X	X	X	X
Environmental/Safety Manager	X	X		X	X
Plant Manager		X			X