

# **Attachment 7**

**RCRA Part B Permit Application**

## **Training Programs and Documents**

**US Ecology Tulsa, Inc.**

**EPA ID: OKD000402396**



**Tulsa, Oklahoma**

**Permit Application**

**July 11, 2022**

## **Table of Contents- Training Programs and Documents**

1. Outline of Training Program: 40 CFR 264.16 and 270.14(b)(12).....	vii-1
a. Job Titles and Duties: 40 CFR 264.16(d).....	vii-2
b. Training Content, Frequency, and Technique.....	vii-2
c. Training Director.....	vii-2
d. Relevance of Training to Job Position.....	vii-2
e. Training for Emergency Response.....	vii-3
2. Implementation of Training Program.....	vii-3
3. Figure 1- Training Topics.....	vii-5
4. Figure 2- Training Certificate Example.....	vii-6

## **TRAINING PROGRAMS AND DOCUMENTS**

The information contained in this section outlines the personnel training program for US Ecology Tulsa, Inc. in accordance with the requirements of 40 CFR 270.14(b)(12) and 264.16. The US Ecology Tulsa, Inc. training program includes both classroom and on-the-job training designed to prepare personnel to operate or maintain the facility in a safe manner. This training plan includes both introductory (orientation) training as well as continuing training components.

### **1. OUTLINE OF TRAINING PROGRAM: 40 CFR 264.16 and 270.14(b)(12)**

The EHS Manager (or their designee) is responsible for implementation of the training program. The US Ecology Tulsa, Inc. training program includes information regarding hazardous waste management procedures and implementation of the facility Contingency Plan (i.e., emergency procedures and use of emergency equipment) as well as preparedness and prevention guidelines. US Ecology Tulsa, Inc. has developed a Training Outline for US Ecology Tulsa, Inc. employees that is maintained on-site.

Training may be conducted by US Ecology trainers or outside resources may be used to meet training requirements. Outside resources may include personnel from affiliated companies, consultants, or other experts. Topics covered by the US Ecology Tulsa, Inc. training program are summarized in **Figure 1-Training Topics** at the end of this attachment.

As scheduling permits, employees will receive classroom training and on-the-job training. Each new employee will work with an experienced employee who performs the same or supervisory job functions. The new employee will not work unsupervised in their designated job task until they have successfully completed their on-the-job training. A written description of the amount and type of training received is maintained as part of

each employee file. **Figure 2-Employee Training Documentation** is an example of the type of form used for documentation of employee training.

a. **JOB TITLES AND DUTIES: 40 CFR 264.16(d)**

As required under 40 CFR 264.16(d), the job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job is maintained in the facility operating record. In addition, a written job description for each position related to hazardous waste management is also maintained in the facility operating record. This job description will include the requisite skill, education, other qualifications (if applicable), and duties of employees assigned to each position.

b. **TRAINING CONTENT, FREQUENCY, AND TECHNIQUE**

Topics covered by the US Ecology Tulsa, Inc. training program are summarized in Figure 1-Trainig Topics. In addition to training regarding normal operations on-site, the US Ecology Tulsa, Inc. training program is designed to ensure that facility personnel can respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems.

c. **TRAINING DIRECTOR**

The EHS Manager, or their designee, directs the US Ecology Tulsa, Inc. training program and is assisted in this task by US Ecology Tulsa, Inc. personnel for recordkeeping requirements and procedures.

d. **RELEVANCE OF TRAINING TO JOB POSITION**

The US Ecology Tulsa, Inc. training program is directed by a person trained in hazardous waste management procedures. This training program includes instruction which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed.

e. **TRAINING FOR EMERGENCY RESPONSE**

The US Ecology Tulsa, Inc. training program is designed to ensure that facility personnel can respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems, including, where applicable:

- Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment
- Communications or alarm systems
- Response to fires or explosions
- Response to ground-water contamination incidents; and
- Shutdown of operations

2. **IMPLEMENTATION OF TRAINING PROGRAM**

Upon employment, all personnel involved with hazardous waste will be required to complete at least twenty-four (24) hours of Initial HAZWOPER Training (i.e., TSDF Emergency Response Training in accordance with 29 CFR 1910.120(p)(7)). At the discretion of USE Tulsa, 40 Hour "HAZWOPER" training or the first 24 hours a 40 Hour HAZWOPER course may be substituted for 24 Hour Initial Training. Also, these personnel will receive an eight (8) hour update training (OSHA 24 HAZWOPER) session once a year. This training may be supplemented with attendance by the employees at on-site/offsite seminars conducted by facility personnel or consulting contractors involving hazardous waste management and operations.

In accordance with 40 CFR 264.16(b), operations personnel will complete this training program within six months of assignment to unsupervised duties involving hazardous wastes, or within six months of their date of employment, whichever is later. New operations personnel will not work at the USE Tulsa facility unsupervised prior to completion of the training program as discussed above.

At least once each year, the EHS Manager (or designee) will review all training records and will initiate revision or review of the training program as appropriate for changes in waste operating procedures. All operations personnel are required to review the Contingency Plan annually.

Records documenting the job title for each position, job descriptions, names of employees and completed training programs (both introductory and review) will be kept on-site in the personnel files. Training records on current personnel will be kept until closure of the facility; training records on former employees will be kept for at least three years from the date the employee last worked at the facility. Personnel training records may accompany personnel transferred within US Ecology Tulsa, Inc. or from affiliated companies.

-----END OF SECTION-----

**Figure 1- Training Topics**

<b>Table H-1, Training Topics</b>			
<b>Training</b>	<b>Required Hours</b>	<b>Frequency</b>	<b>Applicability</b>
Classroom Training*	24	Prior to unsupervised work in operations areas	Operations Personnel
Respirator - Fit Test	N/A	Annually	Operations Personnel
Chemical Awareness – Hazard Communication Right To Know	1	Annually	All Site Employees
Contingency Plan	2	Annually	All Site Employees
Standard Operating Procedures**	2	Annually	Operations Personnel
Shipping Documents (i.e., HM 181, 126F, Manifest & LDR requirements)	2	Annually	Operations Personnel
Waste Analysis Plan requirements	1	Annually	Facility Management, Laboratory personnel, and Receiving/Customer Service Clerk
Fire Extinguisher Use	1	Annually	All Site Employees

\* The classroom training program includes training on the following topics: Hazardous Material Handling, Personal Protective Equipment, and Decontamination Procedures.

\*\* The standard operating procedures training program includes training on the following topics: Control Systems, Container Management, Tank Material Transfer.

**Figure 2- Training Certificate Example**



**US Ecology Tulsa, Inc.**

**Certificate of Training Completion**

Employee name:

\_\_\_\_\_

Has completed training for the following topic:

\_\_\_\_\_

Training Outline:

Date of Training: \_\_\_\_\_

Name of trainer: \_\_\_\_\_

Trainer Signature: \_\_\_\_\_