

# Appendix H - Personnel Training Program

# 1.0 Personnel Training Program

## 1.1 Outline of Training Program

Wynnewood Refining Company, LLC (“WRC” or “Facility”) personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the Facility's compliance with the requirements of the hazardous waste regulations.

## 1.2 Management of the Personnel Training Program

The Personnel Training Program is managed by the Training Supervisor who maintains detailed records of training. The Environmental Manager has management responsibility for directing the Personnel Training Program and ensuring that the Personnel Training Program is properly administered and is current.

## 1.3 Training Content and Frequency

The type of training to be conducted is dependent on an individual's job title. Training may include, as appropriate:

- Identification of hazardous wastes
- How to determine if a solid waste is hazardous
- General RCRA information
- Pollution prevention
- Contingency plan and emergency response, including procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment; key parameters for automatic waste feed cut-off systems; communications or alarm systems; response to fires or explosions; response to ground-water contamination incidents; and, shutdown of operations.
- Waste minimization plan
- Waste profiling and manifesting
- Inspection requirements

The Personnel Training Program consists of initial training and annual refresher training. Facility personnel must successfully complete the required elements of the Personnel Training Program specific to their position within six (6) months after the date of their employment or assignment to a facility, or to a new position at a facility, whichever is later. Employees must not work in unsupervised positions until they have completed those training requirements.

Facility personnel must also take part in an annual review of the initial training described above.

## **1.4 Recordkeeping**

The records listed in Sections 1.4.1 through 1.4.4 below are to be maintained by the Facility:

### **1.4.1 Job Titles and Names of Personnel**

The job title for each position at the Facility related to hazardous waste management, and the name of the employee filling each job are to be maintained.

### **1.4.2 Job Descriptions**

Appendix H-1 (below) includes a written job description for each employee at the Facility whose work may be related to hazardous waste management. Those descriptions include the requisite skill, education, or other qualifications and duties of employees assigned to each position.

### **1.4.3 Required Training**

Appendix H-2 (below) includes a written description of the type and amount of both initial and continuing training that will be given to each person filling a position listed under Section 1.4.2, above.

### **1.4.4 Records of Training**

Records that document that the training or job experience required Sections 1.4.1 through 1.4.3 above will be maintained.

Training records on current personnel will 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. Personnel training records may accompany personnel transferred within the company.

**Appendix H-1 Job Descriptions****Position Title:** Manager, Environmental

- **Qualifications & Experience:** Engineering Degree or BS degree.
- **Position Responsibilities and Duties:** This position is responsible for managing the activities of the environmental department. Duties include the coordination and implementation of activities necessary to ensure compliance with environmental regulations that affect WRC to execute their environmental policies. This includes direct handling of hazardous waste.

**Position Title:** Environmental Specialist

- **Qualifications & Experience:** Engineering Degree or BS degree.
- **Position Responsibilities and Duties:** This position assists the environmental manager with the activities of the environmental department. Duties will include the coordination and implementation of activities necessary to ensure compliance with environmental regulations that affect WRC. This includes direct handling of hazardous waste.

**Position Title:** Maintenance Superintendent/Maintenance Foreman

- **Qualifications and Experience:** High school education with a minimum of ten (10) years' experience, including five (5) years of supervisory experience.
- **Position Responsibilities and Duties:** Responsible for maintenance functions at the refinery as assigned by the Maintenance manager. Hazardous waste responsibilities include assigning properly trained personnel to hazardous waste handling activities. This includes the removal and packaging of hazardous waste from process areas and/or hazardous waste storage areas.

**Position Title:** Maintenance Supervisor

- **Qualifications and Experience:** High school education with a minimum of five (5) years' experience in maintenance or operations. Trained in hazardous waste handling and disposal.

- **Position Responsibilities and Duties:** The maintenance supervisor is responsible for the direct supervision of equipment operators and general maintenance employees that will include handling of hazardous waste.

Position Title: Process Engineer

- **Qualifications and Experience:** BS degree in engineering to include training in hazardous waste handling and disposal.
- **Position Responsibilities and Duties:** Responsible for engineering associated with the various process units in the refinery. Hazardous waste responsibilities include the handling of hazardous process wastes and catalysts.

Position Title: Maintenance

- **Qualifications and Experience:** High school education with training in hazardous waste handling and disposal.
- **Position Responsibilities and Duties:** Maintenance personnel run equipment used to load/move hazardous waste, and mechanics may repair equipment used to manage or generate hazardous waste.

Position Title: Operator

- **Qualifications and Experience:** High school education with training in hazardous waste handling and disposal.
- **Position Responsibilities and Duties:** This position is responsible for the operation of the API separators. Transfers API separator sludge into tank 2007 prior to off-site disposal. The position is manned a minimum of seven days per week and twelve hours per day.

**Appendix H-2 Required Training**

<b>Job Title</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>6</b>	<b>7</b>	<b>8</b>
Manager, Environmental	I, A	I, A	I, A	I, A	I, A	I, A	I, A	I, A
Environmental Specialist	I, A	I, A	I, A	I, A	I, A	I, A	I, A	I, A
Maintenance Superintendent/Maintenance Foreman	I, A		I, A	I, A	I, A			I, A
Process Engineer	I, A		I, A	I, A	I, A			I, A
Maintenance Supervisor	I, A		I, A	I, A	I, A			I, A
Maintenance	I, A		I, A	I, A	I, A			I, A
Operator	I, A		I, A	I, A	I, A			I, A

I = Required Initial Training

A= Annual Update Required

## Training Topics

- Identification of hazardous wastes
- How to determine if a solid waste is hazardous
- General RCRA information
- Pollution prevention
- Contingency plan and emergency response including procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment; key parameters for automatic waste feed cut-off systems; communications or alarm systems; response to fires or explosions; response to ground-water contamination incidents; and, shutdown of operations.
- Waste minimization plan
- Waste profiling and manifesting
- Inspection requirements