OPA LOCKA, FLORIDA RAIDER ENVIRONMENTAL SERVICES, INC.

ATTACHMENT 9

EMPLOYEE TRAINING PLAN

August, 2013

Employee Training Plan

Raider Environmental Services drivers will be trained in accordance with the "Used Oil Transporter's Training and Certification Manual. The contents of the program and a list of the specific topics is attached. Drivers will also receive Department of Transportation training regarding transportation of hazardous materials (49 CFR Part 172.704).

Plant operators and administrative personnel will receive training per Table 1.

Table 1-Raider Training by Position

x	X			×	Water Treatment Technician
X	x			x	Engineer
x	x	x	X	x	Raider Management
x	x				Instrict AviterizinimbA
X	x			x	Oil Processing Technician
X	X	x	x		Driver
MOJZAH	DEP Regulations	Bninis _T T TOQ	Used Oil Driver Manual	HAZWOPER-OSHA 1910.120	eltit dol

Introduction and Training Program Description

I. Introduction

In an effort to associate the term "Used Oil" with thoughts of a well managed, recyclable resource, the publisher of this invaluable publication has searched through federal and state resources to bring you the *Used Oil Transporter's Training and Certification Manual*.

If you transport or collect used oil, used oil filters, anti-freeze or any form of petroleum waste from more than one generator and transport it, if you own or operate a used oil transfer facility, please carefully read the information within this manual.

This manual will answer your questions concerning:

What is considered used oil?

When is used oil considered hazardous and should not be managed as used oil?

What is an EPA ID# and how do I get it?

How should I train my drivers?

What should I do if my truck springs a leak? Who should I notify?

Can I store oil on my truck till I get a full load?

What kind of records do I need to keep? Where do I get the proper forms for recording?

This manual is an excellent resource for the introduction of a new employee and the application of laws he needs to follow before he begins unsupervised transportation of waste oil and related products. Mark it up, add to it as you see fit to meet your needs. It is intended to help answer your questions. If you need further clarification please call or write the Used Oil Program Coordinator at the Department of Environmental Protection at (850) 245-8755.

II. Training Program Description

A. General Overview

Section 403.767 of the Florida Statutes mandates the Florida Department of Environmental Protection to develop rules governing certification of used oil transporters. This certification process was codified in Rule 710.600 of Chapter 62 of the Florida Administrative Code. Included below is the specific Rule language for your use.

B. Training Manual Objective

As described above, the training manual's main objective is to assure that employees engaged in the transportation and management of used oil are thoroughly familiar with state and federal rules governing used oil, as well as proper used oil management practices including appropriate response actions to any breach, release or spill.

To assist your business in developing a suitable training program, the *Used Oil Transporters Certification and Training Manual* has been structured to provide a suitable base curriculum for used oil training. Key training areas include used oil, transportation, emergency and spill response procedures, storage tank, PCB, and PCW regulations.

C. Training Manual Description

To assist your business in properly educating your employees, the *Used Oil Transporters Certification and Training Manual* has been structured to serve as an outline for your used oil-training program. Key training areas identified include used oil, transportation, storage tank, PCB, and PCW regulations, as well as emergency and spill response procedures. These areas have been labeled with "Course" numbers in the Table of Contents. You may customize your individual corporate training program to meet your needs, or you may use the certification and training manual as the cornerstone of your Training Program.

It is recommended that a minimum of thirteen (13) hours of training be conducted relative to the rules governing used oil management and proper used oil management procedures. Listed below are minimum training hours recommended for the Courses identified within the Certification Manual.

Base Curriculum:

Course 1- Compliance with Used Oil & Used Oil Filter Regulations	
Course 2- Emergency and Spill Response Procedures	3.0 hours
Course 3- Compliance with Storage Tank Regulations	0.5 hours
Course 4- Compliance with PCB Regulations	0.5 hours
Course 6- Compliance with Transportation Regulations	3.5 hours

Supplemental Curriculum:

Course 5- Compliance with Petroleum Contact Water Regulations 1.0 hour

Each Section or Course in this manual contains a General Overview and Rule Highlights Section. Educating yourself and your employees with this information will assure familiarity with those laws and rules governing used oil transportation. A Specific Rules and Laws Section has been included to assist you in accessing detailed information covered within the General Overview and Highlights Section.

As a used oil transporter your business is solely responsible for providing assurance that the training, duration and methodology used by your company is adequate

D. Implementation and Verification of Training

Rule 62-710.600(2)(b)3 requires new employees to be introduced to the applicable laws and rules before unsupervised driving of an used oil transportation vehicle.

Rule 62-710.600(2)(b)4 mandates that new employees shall complete the training program as soon as possible but no later than 90 days after beginning employment. Continued education as part of the training program, is highly recommended. Rule 62-710.600(3) states that training programs shall be reviewed and updated annually to address changes in regulations.

Rule 62-710.600(2)(c) requires the maintenance of training records in the company's operating record and the individual personnel files indication the type of training received along with the dated signature of those receiving and providing training.

Located on pages 7-10 of this certification and training manual are the *Used Oil Training Program Submittal Documents*. When completed and submitted to the FDEP, these documents will assist the Department in its evaluation and certification of your corporate training program.

Please note the form will require your manual's serial number.

This is a unique number that has been assigned to your company only. When the Department evaluates and accepts your certification, the serial number you have provided on the forms will help identify your company's training program as acceptable. As this manual is a copyrighted publication, for your protection, do not share the contents of this manual with anyone outside of your company.

Included with the *Forms* section beginning on page 63, are Record of Compliance Forms which may be used to maintain a record of training for your company's records and for placement into individual personnel files.

Preface

This newly revised *Used Oil Transporters Certification and Training Manual* is made available to the industry and interested parties. Copying or reproduction in any form is prohibited, except for the private use of the owner (original purchaser) of the manual.

The publisher wishes to thank the industry volunteers, the Florida Department of Environmental Protection, The Florida Department of Transportation, and all industry affiliates who helped to prepare, coordinate and review the manual.

We recognize the importance of recycling used oil in Florida's sensitive environment. Industry members and affiliates are expected to adhere to and uphold local, state and national laws affecting the regulated community.

For a list of, or information on, the registered used oil transporters in Florida, please contact the Used Oil Coordinator at FDEP.

Using this manual

Located on pages 7-10 of this certification and training manual are the *Used Oil Training Program Submittal Documents*. When completed and submitted to the FDEP, these documents will assist the Department in its evaluation and certification of your corporate training program.

Please note the form will require your manual's serial number. This is a unique number that has been assigned to your company only. When the Department evaluates and accepts your certification, the serial number you have provided on the forms will help identify your company's training program as acceptable. As this manual is a copyrighted publication, for your protection, please do not share the contents of this manual with anyone outside of your company.

Included with the Forms section beginning on page 63, are Record of Compliance Forms, which may be used to maintain a record of training for your company's records and for placement into individual personnel files.

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Disclaimer

While every effort has been made to insure the accuracy of the contents of the manual, the publisher nor its agents take responsibility for its contents and applicability to or interpretation of the laws. Competent legal counsel should be sought to insure compliance with the laws affecting used oil transportation as they apply to individuals and businesses in Florida.

Additional Copies

Additional copies of this Used Oil Transporters Certification and Training Manual may be ordered from: BFA Custom Publications, 318 Newman Rd., Sebring, Fl. 33876-6702. Telephone 863-655-0691 — FAX 863-655-3713.

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