Application Part II.A.4.e Personnel Training

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FOR
PERSONNEL TRAINING**

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PERSONNEL TRAINING

1.0 INTRODUCTION

Triumvirate Environmental Services, Inc. has developed a training program for its employees involved in hazardous waste management operations to ensure the facility will be operated and maintained in a safe manner. The program has been designed to train personnel with the necessary level of awareness and knowledge to provide assurance of proper performance on job assignments with respect to safety, hazardous waste management, and response to incidents at the facility. Triumvirate Environmental Services, Inc. personnel conduct operations that have varying levels of involvement in the management of hazardous waste. Some employees have direct contact with hazardous wastes, while others are only involved in preparing documents related to management of hazardous wastes. The training program for employees emphasizes those aspects of the job the employee has been assigned to perform. At the same time, the program trains employees about areas of operation that are not required by their job assignment where those areas may affect performance with respect to safety and response to emergencies.

2.0 PROGRAM OBJECTIVES

The training program is designed to address five major areas of concern which are listed below:

- safety and emergency measures and personal protective equipment;
- hazardous waste management procedures, including potential hazards posed by materials and operations;
- compliance with environmental, transportation, and occupational safety and health regulations;
- emergency response and contingency plan implementation; and
- proper performance on job assignments.

The program consists of initial and refresher training to teach employees how to perform assigned duties while observing the five areas of concern listed above. The training includes classroom instruction and/or on-the-job orientation.

3.0 PERSONNEL ORGANIZATION

This section of the training program describes the organization of personnel and their level of involvement in managing hazardous waste at the facility. **Figure I** includes a simplified organization chart for Triumvirate Environmental Services, Inc. that shows four major management areas within the facility. The management areas are sales, administration, environmental, and plant. Most employees are somehow related to the management of hazardous waste, either in direct contact with it or in preparing and processing documentation and data. Personnel in sales are not subject to the provisions of this permit application with

respect to training because they do not work in any of the operations and processes located at the facility site. Therefore, training for sales is not discussed in this program. Sales personnel operate at locations within the geographical area from which they provide services to customers of Triumvirate Environmental Services, Inc. Sales personnel do not work in the parts of the facility detailed in the Part B permit and are not included in the facility training program. Such personnel may participate in general orientation offerings.

Administration operations perform office-related functions for the facility. This management area includes general services (i.e., receptionist and administrative assistant), accounting (i.e., payables and receivables), and waste management, which consists of personnel responsible for the preparation and processing of documents and data related to the management of hazardous waste by the facility.

Environmental operations provide guidance to facility personnel regarding compliance with regulations and permit conditions, review documents, and supervise compliance recordkeeping. This management area is not part of the line organization that performs the services offered by the facility. Environmental operations functions as a staff position having an advisory role.

Finally, the plant management oversees the hazardous waste operations and processes at the facility and transportation to and from client sites and disposal facilities. Plant personnel are constantly and directly involved in hazardous waste management.

4.0 TRAINING INFORMATION RESOURCES

Hazardous waste facilities are subject to environmental requirements. When waste is shipped to other facilities, the facility becomes subject to transportation regulations. When employees are required to perform hazardous duties, the facility is subject to occupational health and safety regulations. Therefore, besides receiving training on environmental requirements, there are other regulations outside the environmental domain for which personnel should be trained. Some transportation requirements have been included in the environmental regulations, such as manifesting and marking. However, some transportation and occupational requirements are referenced only by citation or are not detailed at all.

This part of the training program describes some of the regulations, permit application, and operations documents used to accomplish the objective of this program. Regulations that affect operations at the facility with respect to this program are those promulgated by EPA, DOT, and OSHA in the Code of Federal Regulations (CFR) in Titles 40, 49, and 29, respectively. The regulations indicate specific requirements for procedures and operations conducted at the facility. This application describes the methods used to manage the facility in accordance with environmental regulations. Several sections of the permit are utilized to train personnel on areas related to safety, operations, and emergency response. Operation documents consist of manuals and procedures that provide valuable assistance for training of personnel. These

documents may be manuals provided by the manufacturers of equipment used in the processes or operations at the facility or guidance documents published by public or private institutions on hazardous waste management, safety, emergency, or other technical issues. Documents used may also be procedures prepared by the facility, either to focus on specific parts of the operations and processes or to provide more comprehensive information on operations and processes than those contained in the permit application. This application contains general information on every hazardous waste process or operation conducted at the facility.

5.0 PROGRAM DEVELOPMENT METHOD

The training program has been developed to achieve the objectives defined in sub-section 2.0 of Training Program for Hazardous Waste Part B Permit for the 10100 Rocket Boulevard, Orlando, Florida facility. The topics and degree of training that employees need to receive in order to achieve the objectives of the program require that the content of the training plan be varied, depending on the level of involvement employees have in hazardous waste management. Section 3.0 describes personnel organization at the facility and the level of involvement employees have in hazardous waste management for the areas shown in the organization chart. The training outline presented in this plan identifies the parts in the training information sources that should be used to train personnel to accomplish the objectives of the program.

6.0 TRAINING OUTLINE

A sample training outline is provided as **Exhibit I**. The following section lists every personnel group separately and identifies the regulations, permit sections, and operation documents that are of special interest to that personnel group. The level of proficiency required of each employee depends on the degree of responsibility and the job the employee is required to perform. The extent of instruction on a training topic an employee should receive is determined by these two factors.

ADMINISTRATION PERSONNEL

Compliance with Environmental, Transportation, and Occupational Regulations –

Regulations:

-- 40 CFR 261; for personnel involved in the waste evaluation
-- 40 CFR 262; for personnel involved in processing outbound shipments
-- 40 CFR 263; for personnel involved in processing waste in transfer
-- 40 CFR 264: for personnel involved in processing inbound shipments
-- 40 CFR 268; for personnel involved in processing waste shipments
-- 49 CFR 172; for personnel involved in waste shipments and evaluation

Permit:

-- Waste Analysis Plan; for personnel involved in waste evaluation
-- Manifest and Recordkeeping; for personnel in shipping and evaluation

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ENVIRONMENTAL PERSONNEL

Safety Measures and Protective Equipment –

Regulations:

-- 40 CFR Part 264 – Prevention; ignitables, reactives, and incompatibles
-- 49 CFR Part 177 – Hazardous materials segregation and separation
-- 29 CFR 1910.120 - Occupational Safety and Health Standards: Hazardous Materials
-- 29 CFR 1910.146 – Confined space entry
-- 29 CFR 1910.147 – Lockout/tagout of electrical power supply

Permit:

-- Procedures, Structures, and Equipment Used to Prevent Hazardous Waste [II.A.4.c]
-- Preparedness and Prevention

Potential Hazards Posed by Materials and Operations –

Regulations:

-- 49 CFR Part 177 – Hazardous materials segregation and separation
-- 29 CFR 1910.120 – Occupational Safety and Health Standards: Hazardous Materials
-- 29 CFR 1910.146 – Confined space entry
-- 29 CFR 1910.147 – Lockout/tagout of electrical power supply

Permit:

-- Contingency Plan and Emergency Procedures [II.A.4.b]; sub-section 5.0
-- Description of operations for storage and treatment [II.B and C]

Compliance with Environmental, Transportation and Occupational Regulations –

Regulations:

-- 40 CFR Part 261 – Identification and listing of hazardous waste
-- 40 CFR Part 262 – Requirements for generators of hazardous waste
-- 40 CFR Part 263 – Requirements for transfer facilities
-- 40 CFR Part 264 – Requirements for hazardous waste permitted facilities
-- 40 CFR Part 268 – Requirements for land disposal
-- 49 CFR Part 172 – Hazardous materials description and labeling
-- 49 CFR Part 173 – Hazardous materials classification and packaging
-- 49 CFR Part 177 – Hazardous materials segregation and separation
-- 29 CFR 1910.146 – Confined space entry
-- 29 CFR 1910.147 – Lockout/tagout of electrical power supply

Permit: Permit conditions and permit application

Emergency Response –

Regulations:

-- 29 CFR 1910.120 – Occupational Safety and Health Standards: Hazardous Materials

Permit:

-- Contingency Plan and Emergency Procedures [II.A.4.b]

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PLANT PERSONNEL

Safety Measures and Protective Equipment –

Regulations:

-- 29 CFR 1910.120 – Occupational Safety and Health Standards: Hazardous Materials
-- 29 CFR 1910.146 – Confined space entry
-- 29 CFR 1910.147 – Lockout/tagout of electrical power supply

Permit:

-- Procedures, Structures, and Equipment Used to Prevent Hazards [II.A.4.c]
-- Preparedness and Prevention [II.A.4.d]

Operation Documents: Procedures developed for operations and processes

Potential Hazards Posed by Materials and Operations –

Regulations:

-- 49 CFR Part 177 – Hazardous materials segregation and separation
-- 29 CFR 1910.120 – Section III of Exhibit II.A.4.e.-1
-- 29 CFR 1910.146 – Confined space entry
-- 29 CFR 1910.147 – Lockout/tagout of electrical power supply

Permit:

-- Contingency Plan and Emergency Procedures [II.A.4.b]; sub-section 5.0
-- Description of operations for storage and treatment [II.B and C]

Compliance with Environmental, Transportation, and Occupational Regulations –

Regulations:

-- 40 CFR Part 261 – Identification and listing of hazardous waste
-- 40 CFR Part 263 – Requirements for transfer facilities
-- 40 CFR Part 24 – Requirements for hazardous waste permitted facilities
-- 49 CFR Part 172 – Hazardous materials description and labeling
-- 49 CFR Part 177 – Hazardous materials segregation and separation
-- 29 CFR1910.146 – Confined space entry
-- 29 CFR 1910.147 – Lockout/tagout of electrical power supply

Permit:

-- Description of operations for storage and treatment [II.B and C]

Emergency Response –

Regulations:

-- 29 CFR 1910.120 – Occupational Safety and Health Standards: Hazardous Materials

Permit Application:

-- Contingency Plan and Emergency Procedures [II.A.4.b]

Proper Performance on Job Assignments –

Permit:

-- Description of operations for storage and treatment [II.A and B]

Operation Documents: Procedures developed for operation and processes

7.0 DESCRIPTION OF TRAINING MATERIAL

This part of the training program describes some of the written materials or publications used to train personnel on topics listed in the training outline. The CFR, other publications, written material prepared by the facility, and audio/visual materials are used in the training program to instruct personnel

Environmental Regulations: Training on environmental regulations may be carried out with the actual regulations as published in the Code of Federal Regulations, with manuals or guides published by public or private agencies or institutions, or with written materials prepared by the facility. Environmental personnel are trained in the regulations published in the CFR, and they must have a good understanding of the requirements in the areas of emergency response; preparedness and prevention; waste evaluation; shipping; recordkeeping; and reporting, monitoring, and control of emissions from vents and leaks for treatment and storage facilities. The intent of the program is to train administration and plant personnel on the environmental regulations with respect to:

- identification and coding of hazardous waste, which is needed for reviewing and completing waste profiles, markings, manifests, and land disposal restriction documents;
- information needed on a manifest during preparation of outbound shipments and when receiving inbound shipments, as well as for land disposal restriction documents that should accompany the manifest;
- prevention of hazards, response to emergencies, recordkeeping, reporting, inspection, storage, and treatment requirements for hazardous waste permitted facilities; and
- storage time period limitations, structures, and recordkeeping requirements for transfer facilities.

Transportation Regulations: DOT regulations require shippers of hazardous materials (including hazardous wastes) to be trained in the preparation of hazardous waste for transportation. Preparation for transportation includes shipping papers, marking, labeling, containers, segregation, and proper separation of hazardous materials. Requirements for shipping papers and marking for hazardous wastes is addressed in the environmental regulations and in the transportation regulations. Environmental personnel are trained in the transportation regulations, and they must have a good understanding of the requirements in the areas of DOT description, marking, labeling, containers, classification, packaging, segregation, and separation of hazardous materials. The intent of the program is to train administration and plant personnel in transportation regulations with respect to:

- classification and DOT description of hazardous materials for use in waste evaluation, manifests, and hazardous waste labels;
- selection, labeling, and marking of hazardous waste containers;
- preparation of shipping papers for hazardous waste shipments; and
- segregation and separation of hazardous wastes for transportation and storage.

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Occupational Regulations: Plant personnel are subject to OSHA regulations when conducting hazardous waste operations and maintenance of certain equipment. Facility personnel are not expected to perform remediation or other types of operations at contaminated sites, nor to be first responders for incidents occurring at or outside the facility site. They are trained to meet the OSHA Hazardous Waste Operations and Emergency Response (HAZWOPER) requirements in 29 CFR 1910.120. The HAZWOPER training course will be provided for plant personnel who are directly involved in handling hazardous waste. An outline of the HAZWOPER course is shown in **Exhibit I**. When necessary and appropriate, this outline will be modified to replace parts of the agenda with other topics that are more relevant to the type of operations conducted at the facility. Parts of the permit application with respect to preparedness and prevention; manifesting; recordkeeping; and reporting, monitoring, and control of emissions from vents and leaks for hazardous waste facilities may be utilized. This course will include examples of relevant regulatory issues specific to the facility. Confined space entry and lockout/tagout procedures may be included in the training. The intent of this program is to train plant personnel about proper occupational procedures with respect to:

-- evaluation of hazards posed by materials or operating conditions;
-- personal protection equipment, monitoring, and engineering controls when operating in conditions that may be hazardous to human health;
-- contingency planning and emergency response; and
-- confined space entry and lockout/tagout procedures.

The Permit Application: This application describes procedures and operations conducted at the facility. The permit is expected to approve those procedures and plans prepared in response to and required by the regulations. This permit application contains information regarding:

-- the contingency plan and emergency procedures that must be followed in the event of emergency incidents at the facility;
-- procedures, structures, and equipment used to prevent and mitigate hazards to human health and the environment at the facility;
-- preparedness and prevention procedures used to minimize the occurrence of incidents and to ready the facility in the event they occur;
-- methods specified in the waste analysis plan to evaluate wastes received and shipped by the facility;
-- procedures for processing inbound and outbound waste shipments, recordkeeping, and reporting;
-- hazardous waste operations and treatment processes conducted at the facility with respect to requirements for containers and tanks involved in such operations and processes; and
-- methods for monitoring and controlling emissions from process vents and equipment leaks.

Operating Documents: Triumvirate Environmental Services, Inc. may prepare procedures and other documents to complement the available information for use in training personnel. Operation documents may also consist of manuals provided by the manufacturers of equipment used in operations and processes at the facility. Operation documents prepared by the facility may help train:

-- administration personnel on procedures dealing with waste evaluation, shipments, recordkeeping, and waste in transfer; and

-- plant personnel on procedures and operations conducted at the facility with respect to storage and treatment of hazardous waste and safety requirements when performing maintenance operations on equipment.

8.0 TRAINING IMPLEMENTATION METHOD

Training of personnel takes place either in a classroom environment or in the field while employees are performing the tasks their job assignments require. Training may also take place at a location where it is convenient to teach the issue being addressed, such as the file room where filing cabinets hold documents related to the topic of the training. Similarly, instead of a group of trainees receiving instructions from a trainer, training may occur on a one-to-one basis.

Field or on-the-job training takes place during the operation and at the location where the operation occurs. This type of training is more applicable when it involves topics that are better explained when the operation is taking place or near the equipment that is the subject of the training.

9.0 TRAINING PROGRAM ADMINISTRATION

The organization structure established to implement the training program consists of a training director, training instructor, and recordkeeper. An organizational chart showing the structure of the program administration is included as **Figure I**. The training director is responsible for the program with respect to directing training event development ensuring the training event conforms to the requirements of the outline, evaluating the effectiveness of the training instructor, and verifying training documentation and recordkeeping. Minimum qualifications for the training director are a Bachelor's degree in Science, engineering, or environmental field, or 3 years experience in the environmental field. The training instructor is the trainer who teaches the topic selected for the training event and completes the necessary documentation associated with the training event. The record keeper gathers, organizes, and files the necessary documentation associated with the training event and ensures that training documentation for initial and refresher training for facility personnel is complete, in order, and in compliance with the regulations and the permit.

10.0 TRAINING INSTRUCTORS

The facility may contract the service of outside organizations to conduct training for plant personnel. Some of the topics in the training course specific to the facility may be conducted by facility personnel. Therefore, training may be conducted by a combination of outside organizations and facility personnel.

Instructors for outside organizations conducting training at the facility will be deemed competent based on previous documented experience in the specified area of instruction, successful completion of a "train-the-trainer" program specific to the topics to be taught, or an evaluation of instructional competence by the training director. Instructors will be required to maintain professional competency by participating in continuing education or professional development programs or successfully completing an annual refresher course.
Facility (on-site) instructors conduct training of administration personnel on an as-needed basis, mostly for newly hired personnel requiring introductory training or existing personnel requiring refresher training. They also conduct training of plant personnel on subjects not covered in the HAZWOPER course or on HAZWOPER topics with the intent to meet some of the training requirements before outside organizations come in to complete the training. On-site instructors may be environmental personnel for topics related to the regulations and the permit or trained facility personnel from other management areas for topics related to operational issues. Facility personnel conducting training are either employees at the supervisory level or trained employees who have experience and skills on the training subject. Environmental personnel should be trained on the regulations and the permit in accordance with requirements in the outline and have at least one year of experience in compliance functions to qualify for training instructor in subjects that involve the regulations and the permit.

11.0 FREQUENCY OF TRAINING

Facility personnel will receive initial training within six months of employment or within six months of assignment to a new position at the facility, if the training requirements of the new position are different from that of the old position.

Refresher training is conducted annually. Refresher training may be conducted to update personnel on regulatory changes and train personnel on improved operational procedures or on new process equipment.

12.0 TRAINING DOCUMENTATION AND RECORDKEEPING

Training events completed in accordance with this program will be documented. Training documents will record the following information:

-- name of trainee;
-- date training is completed;
-- name of trainer; and
-- training topic

Training documents will be completed by the training instructor upon completion of the training event. Training documents will be kept at the facility either with other personnel records or separate until the facility closes or for three years from the date the employee last worked at the facility. Copies of the training certificates are kept in an electronic system and available upon request.

13.0 JOB DESCRIPTIONS

Triumvirate Environmental Services, Inc. maintains records at the facility that show the position title, the name of the employee filling the position, and a description of the duties assigned for every employee that holds a position involved in hazardous waste management at the facility. Copies of job descriptions are provided in Exhibit II

FIGURE I- GENERALIZED FACILITY ORGANIZATION CHART

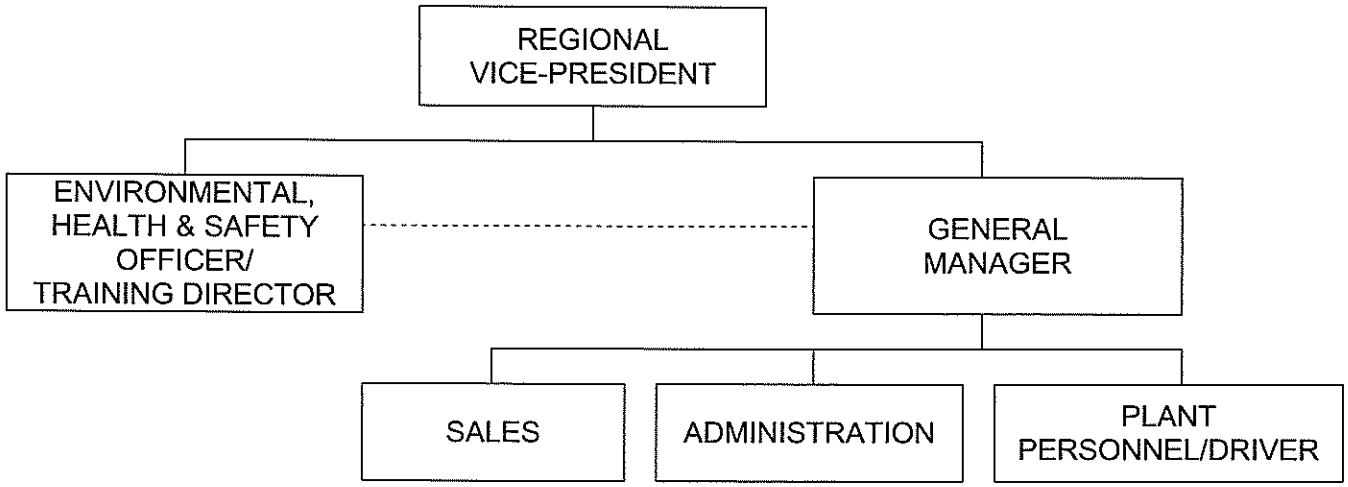

FIGURE II- TRAINING PROGRAM ADMINISTRATION

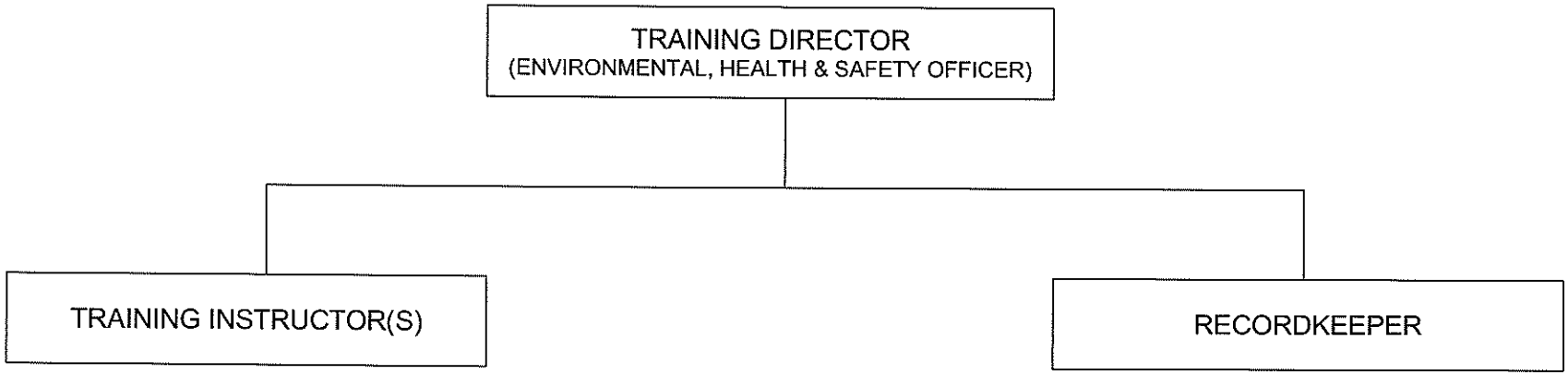

EXHIBIT I- SAMPLE OUTLINE/TRAINING FORM
ORLANDO FACILITY REFRESHER I

Date(s): _____

If employee completes all portions of the Facility Orientation in one day, please date at top and sign at the bottom. If not, please instruct employee to sign each individual section, as completed**

Category	I HAVE BEEN TRAINED IN AND UNDERSTAND THE FOLLOWING:	Instructor Name	Start Time	End Time	Date	Instructor Notes
Occupational Regulations						
	HAZWOPER Review and Applicability					
	Facility Introduction					
	Emergency Response Planning, Contingency Plan,, *Emergency Equipment, Inspection Plan, Types of Incidents and Response, and Plant Tour and Review of all Equipment and Rendezvous Point)*					
	Accident and Injury Reporting					
	Hazard Assessment: Hierarchy of Controls					
	Job Safety Analysis					
	Health and Safety Plan					
	General Safety Plans					
	Chemical Hazards and Toxicology					
	Hazardous Communications					
	Personal Protective Equipment					
	Respiratory Protection					
	Confined Space Awareness					
	Lock Out/Tag Out					

For Training Department Use:
*to be tracked separately: for data entry purposes
**upon completion of final section, update "Orlando Facility Refresher."

ORLANDO FACILITY REFRESHER II

Date(s): _____

If employee completes all portions of the Facility Orientation in one day, please date at the top and sign at the bottom. If not, please instruct employee to sign each individual section, as completed**

Category	I HAVE BEEN TRAINED IN AND UNDERSTAND THE FOLLOWING:	Instructor Name	Start Time	End Time	Date:	Instructor Notes
Environmental Regulations						
	History and Applicability of RCRA Regulations					
	Hazardous Waste Identification and RCRA Waste Codes					
	Hazardous Waste Profiles					
	Labeling Requirements					
	Site Specific Segregation and Storage Requirements					
	The Regulated Community (includes: Requirements for Hazardous Waste Generators, Waste Transporters, and Waste Permitted Facilities)					
	Manifesting and Record Keeping					
	Land Disposal Restrictions and Notifications					
	Site Specific Waste Acceptance and Waste Analysis Plan					
	General and Function Specific Training					
	Shipping Papers					

Transportation Regulations	***Hazard Classifications***					
	Proper Shipping Names					
	Marking					
	Labeling					
	Packaging					
	Segregation and Separation of Hazardous Materials for Transportation					
	Placarding					

For Training Department Use:
*to be tracked separately: for data entry purposes
**upon completion of final section, update "Orlando Facility Refresher."

EXHIBIT II
JOB DESCRIPTIONS

RCRA Hazardous Waste Management Job Descriptions

Position Title: **Driver/Facility, Orlando Facility**

RCRA Classification: **Plant Personnel**

Duties:

- Drive truck to/from assigned locations – locations and scope of work may vary on a daily basis
- Accurately prepares manifests, labels, daily logs, and trip reports.
- Inspect cargo (containers/drums) for loose fittings, deformity and/or signs of leaking prior to loading onto truck.
- Ensure all containers are properly labeled and manifested.
- Load multiple containers (usually 55-gallon drums) of hazardous and non-hazardous waste onto truck for transportation and delivery to other locations.
- Use of drum cart, dolly, or Forklift to handle drums, totes, and/or boxes.
- Maintain equipment in clean and orderly manner at all times.
- Operate all equipment and safe and efficient manner.
- Load, unload, and process containers from trucks to final destination and respond to releases, as needed.
- Ensure all assigned tasks follow Department of Transportation, facility permits, state and federal regulations, and company policies.
- Adhere to all OSHA, Department of Transportation, state and federal, and company safety requirements.
- Maintains clean driving record.
- Provide first response in traffic incidents
- Maintains current Class A/B CDL with HAZMAT endorsement.
- Perform other duties as assigned.

Requisite Skills, Experience, and Education:

H.S. Diploma, GED or equivalent, Class A/B CDL with HAZMAT Endorsement, clean driving record and 3 years hazardous waste handling experience, or equivalent. Ability to maintain clean driving record. Must be able to operate trucks and other equipment in compliance with all applicable safety requirements. Participate in safety and/or compliance trainings as required. Be able to maintain positive customer relationships and WOW both internal and external clients. Be able to communicate with supervisor and staff in a safe and positive manner. Must be willing to submit to drug/alcohol testing, as required. Must be able to follow emergency procedures, if required.

Work Environment

May include occasional exposure to vibration, excessive noise, outdoor elements including seasonal extreme temperatures. Use of Air Purifying Respirator or Self Contained Breathing Apparatus, particulate mask, Tyveks coveralls, gloves, hard hat, safety glasses, hearing protection, high visibility clothing, and/or other PPE, as needed.

Plant Personnel Training:

Type	Frequency
• OSHA 40 Hour HAZWOPER (29 CFR 1910.120)	Once
• OSHA 8 Hour HAZWOPER Refresher (29 CFR 1910.120) *	Annually
• RCRA Refresher**	Annually
• Safety Orientation for New Hires	Once
• 8 Hour Spotter Training for Transfer Station Workers	Initial
• 4 Hour Spotter Training Refresher	Every 3 Years
• Forklift Safety	Every 3 Years
• Site-Specific Spill Prevention Control & Countermeasures	Annually
• Site-Specific Stormwater Pollution Prevention Plan	Annually
• Confined Space Entry	Once
• Confined Space Refresher	Annually
• DOT FMCSR	Once
• DOT FMCSR Driver's Logs	Once
• DOT FMCSR Vehicle Inspection	Once
• DOT HAZMAT Initial Awareness Training	Once
• DOT In-Depth Security Plan	Once
• Site-Specific HAZMAT Security Plan	Annually
• Bloodborne Pathogens	Annually
• Biomedical Waste Handling Training	Annually
• FDEP Required Used Oil Transporters Certification & Training	Annually

*8-Hour Refresher includes the following topics: HAZWOPER Overview, Toxicology, Chemical Hazards, Hazard Communication, Fire Hazards, Emergency Response Principles, Incident Command System, Hazard Assessment, Air Monitoring, Respiratory Protection, Site Control, Levels of Protection, Lockout/Tagout, Confined Space Awareness, & Decontamination.

**RCRA Refresher includes the following topics: Identification and listing of hazardous waste, Requirements for transfer facilities; requirements for hazardous waste permitted facilities, Hazardous Materials description and labeling; Manifesting and Recordkeeping, Permit Conditions & Application; Prevention, ignitables, reactives, & incompatibles; hazardous materials segregation and separation; Procedures, structures, and equipment used to prevent hazards; Contingency Plan; Emergency preparedness and procedures, Procedures developed for operation and processes, & Waste Analysis Plan.

RCRA Hazardous Waste Management Job Descriptions

Position Title: **Facility Manager, Orlando Facility**

RCRA Classification: **Plant/Environmental Personnel**

Duties:

- Supervise/oversee the preparation of hazardous waste shipments
- QA/QC hazardous waste manifests and accompanying land disposal restriction notification forms for compliance
- Resolves manifest discrepancies
- Prepares hazardous waste manifests and supporting documentation for outgoing shipments
- Ability to use computerized inventory control system
- Provides generator sites with signed copy of the hazardous waste manifest
- Inspects and inventories hazardous waste staging and storage areas
- Inspects containers to ensure proper container packaging, marking, and labeling
- Resolves any issues associated with container packaging, marking, and labeling
- Ensures proper procedures are followed for operation of trucks, forklifts, and other machinery to be used in waste movement
- Conducts waste container over-packing operations
- Able to assist emergency coordinator through knowledge of chemical characteristics of the wastes (i.e. reactivity potential, flammability, incompatibility, etc.)
- Ensures proper safety procedures are followed including use of appropriate Personal Protective Equipment (PPE)
- Has ability to shut down operations if necessary
- Oversees consolidation of wastes (if required)

Requisite Skills, Experience, and Education:

B.S. degree and 3 years hazardous waste handling experience, or 5 years hazardous waste handling experience or equivalent.

Training:

Type	Frequency
OSHA 40 Hour HAZWOPER	Once
OSHA 8 Hour HAZWOPER Refresher*	Annually
RCRA Refresher**	Annually
Safety Orientation for New Hires	Once
Disposal Facility Overview	Once
Wasteland Overview	Once
Lab Packs & Lab Pack Bootcamp	Once
Reactives Training	Once
Initial Training Transfer Station Operators & Material Recovery Facilities	Once

• 8 Hour Refresher Transfer Station Operators	Every 3 Years
• Forklift Safety	Every 3 Years
• Site-Specific Spill Prevention Control & Countermeasures	Annually
• Site-Specific Stormwater Pollution Prevention Plan	Annually
• DOT FMCSR	Once
• DOT FMCSR Driver's Logs	Once
• DOT FMCSR Vehicle Inspection	Once
• DOT FMCSR Reasonable Suspicion for Supervisors	Annually
• DOT HAZMAT Initial Awareness Training	Once
• DOT In-Depth Security Plan	Once
• Site-Specific HAZMAT Security Plan	Annually
• Bloodborne Pathogens	Annually
• Biomedical Waste Handling	Annually
• FDEP Required Used Oil Transporters Certification & Training	Annually

*8-Hour Refresher includes the following topics: HAZWOPER Overview, Toxicology, Chemical Hazards, Hazard Communication, Fire Hazards, Emergency Response Principles, Incident Command System, Hazard Assessment, Air Monitoring, Respiratory Protection, Site Control, Levels of Protection, Lockout/Tagout, Confined Space Awareness, & Decontamination.

**RCRA Refresher includes the following topics: Identification and listing of hazardous waste, Requirements for transfer facilities; requirements for hazardous waste permitted facilities, Hazardous Materials description and labeling; Permit Conditions & Application; Prevention, ignitables, reactives, & incompatibles; hazardous materials segregation and separation; Procedures, structures, and equipment used to prevent hazards; Contingency Plan; Emergency preparedness and procedures; Procedures developed for operation and processes; Waste Analysis Plan; & Manifesting and Recordkeeping.

RCRA Hazardous Waste Management Job Descriptions

Position Title: **Facility Specialist I, Orlando Facility**

RCRA Classification: **Plant/Environmental Personnel**

Duties:

- Work in teams to perform lab pack services including chemical segregation, packing, and disposal.
- Perform chemical inventories
- Perform audits and inspections of facilities and laboratories.
- Assist management in developing top accounts and devising standard operating procedures
- Demonstrate supervisory leadership skills through interactions with team members
- Develop an understanding of OSHA regulations as well as Triumvirate's Health and Safety Practices
- Obtain knowledge of technical, customer service, and business components of environmental services
- Learn and work with a computerized waste tracking system
- Ability to work as a team player
- Determination/eagerness to learn about the environmental health & safety field.
- Conduct Consolidations and stabilizations
-

Requisite Skills, Experience, and Education:

- BS/BA in environmental science, Chemistry, Biology, preferred. Must be able to submit college transcript. Successful completion of OSHA/DOT physical examination. Valid driver's license

Training:

Type	Frequency
OSHA 40 Hour HAZWOPER	Once
OSHA 8 Hour HAZWOPER Refresher*	Annually
RCRA Refresher**	Annually
Safety Orientation for New Hires	Once
Disposal Facility Overview	Once
Wasteland Overview	Once
Lab Packs & Lab Pack Bootcamp	Once
Reactives Training	Once
Initial Training Transfer Station Operators & Material Recovery Facilities	Once
8 Hour Refresher Transfer Station Operators	Every 3 Years
Forklift Safety	Every 3 Years
Site-Specific Spill Prevention Control & Countermeasures	Annually

• Site-Specific Stormwater Pollution Prevention Plan	Annually
• DOT FMCSR	Once
• DOT FMCSR Driver's Logs	Once
• DOT FMCSR Vehicle Inspection	Once
• DOT FMCSR Reasonable Suspicion for Supervisors	Annually
• DOT HAZMAT Initial Awareness Training	Once
• DOT In-Depth Security Plan	Once
• Site-Specific HAZMAT Security Plan	Annually
• Bloodborne Pathogens	Annually
• Biomedical Waste Handling	Annually
• FDEP Required Used Oil Transporters Certification & Training	Annually

*8-Hour Refresher includes the following topics: HAZWOPER Overview, Toxicology, Chemical Hazards, Hazard Communication, Fire Hazards, Emergency Response Principles, Incident Command System, Hazard Assessment, Air Monitoring, Respiratory Protection, Site Control, Levels of Protection, Lockout/Tagout, Confined Space Awareness, & Decontamination.

**RCRA Refresher includes the following topics: Identification and listing of hazardous waste, Requirements for transfer facilities; requirements for hazardous waste permitted facilities, Hazardous Materials description and labeling; Permit Conditions & Application; Prevention, ignitables, reactives, & incompatibles; hazardous materials segregation and separation; Procedures, structures, and equipment used to prevent hazards; Contingency Plan; Emergency preparedness and procedures; Procedures developed for operation and processes; Waste Analysis Plan; & Manifesting and Recordkeeping.

RCRA Hazardous Waste Management Job Descriptions

Position Title: **Technical Services Representative**

RCRA Classification: **Administrative**

Duties:

- Assists sales personnel with telephone or written correspondence with new and existing customers.
- Preparation of manifest, land ban forms, labels, waste profiles and related documents for waste pickups and transfers.
- Ensures all invoices and documentation are accurate and conform to contract documentation requirements.
- Assists potential and/or current customers with compliance issues related to waste disposal.
- Preparation of work orders and supporting documentation for customers and internal sales representatives.
- Assists accounts receivables with invoicing, collection and/or other contractual issues.
- Responsible for waste disposal tracking and inventory control, including proper accrual for all outbound transport and disposal services.
- Function as liaison between sales, transportation and disposal personnel, operations, and health and safety manager; providing assistance as needed.
- Maintain accurate customer files.
- Input of generator information and creation of profile information using computer software.
- Create profile re-certification forms and renew or cancel as indicated by the generator.
- Function as a back-up receptionist.
- Other duties as assigned.

Requisite Skills, Experience, and Education:

High school graduate. Vocational training or Higher Education preferred. Attention to detail, capability to multi-task, personality conducive to teamwork, ability to follow written and oral instructions, knowledge of computer applications, ability to maintain professionalism at all times and provide excellent customer services.

Work Environment:
Requires extended periods of sitting, telephone, and computer usage. Lifting and bending required during handling of records and filing.

Training:

Type	Frequency
• OSHA 40 Hour HAZWOPER	Once
• OSHA 8 Hour HAZWOPER Refresher*	Annually
• RCRA Refresher**	Annually
• Safety Orientation for New Hires	Once
• Disposal Facility Overview	Once
• Wasteland/Integrate Business Systems Overview	Once
• Site-Specific Spill Prevention Control & Countermeasures	Annually
• Site-Specific Storm water Pollution Prevention Plan	Annually
• DOT FMCSR	Once
• DOT HAZMAT Initial Awareness Training	Once
• DOT In-Depth Security Plan	Once

*8-Hour Refresher includes the following topics: HAZWOPER Overview, Toxicology, Chemical Hazards, Hazard Communication, Fire Hazards, Emergency Response Principles, Incident Command System, Hazard Assessment, Air Monitoring, Respiratory Protection, Site Control, Levels of Protection, Lockout/Tagout, Confined Space Awareness, & Decontamination.

**RCRA Refresher includes the following topics: Identification and listing of hazardous waste, Requirements for transfer facilities; requirements for hazardous waste permitted facilities, Hazardous Materials description and labeling; Permit Conditions & Application; Prevention, ignitables, reactives, & incompatibles; hazardous materials segregation and separation; Procedures, structures, and equipment used to prevent hazards; Contingency Plan; Emergency preparedness and procedures, Hazardous materials segregation and separation; Procedures developed for operation and processes; Waste Evaluation/Waste Analysis Plan, Processing Outbound Shipments; Processing Waste in Transfer, and Processing Inbound Shipments; and Manifesting and Recordkeeping.