Appendix H

Training Plan
And Job Descriptions
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Training Program Content, Frequency and Techniques

The training program in place for ESF personnel ensures that they know how to operate and maintain the facility in a safe manner. The program consists of both introductory and continuing training and includes on the job as well as classroom training. New employees will complete their introductory training within six months of their first day of work at the ESF. Trained ESF staff will closely supervise new employees until they successfully complete their initial training. Introductory training includes instructions, descriptions and demonstrations of daily operations including, as appropriate:

- Emergency systems, alarms and communication systems;
- Emergency response procedures including response to fires and ground water contamination incidents, where applicable;
- Inspecting, repairing and replacing facility emergency and monitoring equipment;
- Internal waste tracking instructions;
- Container management;
- Waste packing; and
- Waste stream verification.

ESF Chemical Handling and Emergency Response Staff receive a 40 hour Hazardous Waste Operations and Emergency Response (HAZWOPER) training, which meets the requirements of 29 CFR 1910.120. The ESF Office Management and Clerical Support Staff, and the UVM Police Services Shift Supervisors receive, at a minimum, the HAZWOPER Awareness Level Training which meets the requirements of 29 CFR 1910.120.

ESF personnel participate in annual training relevant to their position. This training is provided through internal personnel or through contractors who specialize in various aspects of the hazardous waste management field.

Topics included in a typical annual training program are listed below. Similar timely and equivalent information is presented each year.

- Implementation of the Contingency Plan (Appendix G)
- Chemical Safety and toxicology
- Personal Protective Equipment and Respiratory Protection
- Emergency Procedures
- RCRA and DOT Regulations
- Waste Minimization
- OSHA HAZWOPER (29 CFR 1910.120) refresher training

ESF personnel are also encouraged to attend at least one applicable off-site training program each year.
Job Description for ESF Chemical Handling and Emergency Response Staff

All ESF chemical handling and emergency response personnel have an appropriate level of training and experience or education to adequately perform the tasks described below:

**Basic Function**
To manage the University Hazardous Waste Management program in accordance with applicable state and federal regulations. Train the campus community in the relevant hazardous waste laws and regulations including proper disposal of waste materials and minimization techniques.

**Characteristic Duties/Responsibilities**
- Manage hazardous waste storage facility.
- Pickup, label and transport waste chemicals in accordance with all applicable local, state and federal regulations.
- Prepare waste for proper disposal.
- Respond to chemical spills and releases.
- Implement Contingency Plan (Appendix G)
- Maintain records related to program activities including hazardous waste manifests and other documents required as part of the ESF operating record.
- Serve as a liaison with agencies regulating hazardous waste.

**Transportation**
ESF personnel required to drive the hazardous waste transport vehicle as part of their job duties will attend a training course for hazardous materials/waste transporters.

In addition, any employee who is required to drive a University vehicle will attend the University’s Defensive Driving course. This is conducted through the Department of Risk Management.
ESF Job Titles & Descriptions Relating to Hazardous Waste

Title: Environmental Compliance Manager  
Job Description: Provide regulatory and technical oversight for hazardous waste operations and coordinate emergency response to chemical spills and releases.

Title: Assistant Director of Risk Management  
Job Description: Coordinate emergency response to chemical spills and releases.

Title: Environmental Safety Technician  
Job Description: Collect, transport, package and consolidate, and oversee disposal of hazardous waste, and coordinate emergency response to chemical spill and releases.

Title: Laboratory Safety Professional  
Job Description: Provide safety and environmental Management system training and oversight to campus users of hazardous materials, and coordinate emergency response to chemical spills and releases.

Title: Biosafety Program Manager and Biosafety Assistant  
Job Description: Provide safety and environmental Management system training and oversight to campus users of hazardous materials, and coordinate emergency response to chemical spills and releases.

UVM Police Services
Title: UVM Police Services Shift Supervisor  
Job Description: Secure site in the event of a spill or release until chemical handling and emergency response staff arrive on the scene. Authorized to contact a hazardous material response contractor.

To maintain staffing flexibility; within this facility permit “ESF personnel” refers to anyone with the following job descriptions: 1) Environmental Compliance Manager; 2) Assistant Director of Risk Management; 3) Environmental Safety Technician; 4) Laboratory Safety Professional; and 5) the Biosafety Program Manager and Biosafety Assistant.

Recordkeeping

The following training information is kept as part of the facility operating record:

- Job titles and the names of the employees filling those positions;
- Written job descriptions;
- Descriptions of introductory and continuing training, and;
- Records that document the training received by personnel.

Training records on present personnel are kept until the closure of the facility. Records on former employees are kept for three years from the date they last worked at the ESF.