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Transmitted Via Email and U.S. Mail

February 26, 2016

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Re: FMC Corporation, Middleport, NY
AOC Docket No. II-RCRA-90-3008(h)-0209
EPA ID No. NYD002126845
DER Site No. 932014
Application No. 9-2936-00017/02004
Amended Part 373 Permit Application

Dear Ms. Gardell and Mr. Freeman:

As identified in the draft revised schedule that FMC Corporation submitted to the New York State Department of Environmental Conservation (NYSDEC) by letter dated January 29, 2016, FMC submits the following documents associated with the draft Amended Part 373 Permit Application for FMC's Middleport, New York facility:

1. Attachment R – Waste Analysis Plan
2. Attachment S – Security and Facility Inspection Plan
3. Attachment T – Personnel Training Program Plan

If you have questions or would like additional information, please contact me directly by telephone at (215) 299-6554 or by email at shawn.tollin@fmc.com.

Sincerely,

Shawn J. Tollin
Manager, Environmental Remediation

Enclosures

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ATTACHMENT T

Personnel Training Program Plan



FMC Corporation
Middleport, New York

PERSONNEL TRAINING PLAN

USEPA ID # NYD002126845

NYSDEC Site # 932014

DRAFT February 2016

**FMC Corporation
Middleport, New York**

**USEPA ID # NYD002126845
NYSDEC Site # 932014**

PERSONNEL TRAINING PLAN

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PERSONNEL TRAINING PLAN

1.0 OUTLINE OF TRAINING PROGRAM

The purpose of this Personnel Training Plan is to describe the FMC Corporation (FMC) Middleport, New York facility training program for all personnel whose job responsibilities include hazardous waste management to ensure compliance with the requirements of 6 NYCRR Part 373-2.2(h). This Personnel Training Plan is applicable to activities associated with facility units (i.e., Western Surface Impoundment [WSI] and Eastern Surface Impoundment [ESI]) subject to Part 373 permitting requirements, and hazardous waste management activities associated with on-going RCRA corrective actions (i.e., interim corrective measures [ICMs]) subject to the Part 373 Permit. The WSI and ESI do not currently actively receive and manage hazardous wastes. The continued use of the WSI for management of nonhazardous waste stormwater and collection of contaminated groundwater in the WSI underdrains and Sump 3 as an ICM are subject to requirements specified in the WSI Operations Plan.

This Personnel Training Plan is incorporated by reference into the Part 373 Permit for the FMC Middleport, New York facility. In the event that changes are made to the facility that affect the content of this plan, this plan will be updated in accordance with the requirements of Condition D of Module 1.

1.1 Job Titles and Duties

This Personnel Training Plan is applicable to personnel whose job responsibilities include hazardous waste management associated with the WSI and ESI, and RCRA corrective actions subject to the Part 373 Permit. Work activities associated with the WSI, ESI, and RCRA corrective actions are performed by outside contractors hired by FMC. These activities include implementation of the WSI Operations Plan and operations and maintenance (O&M) of on-going ICMs (e.g., groundwater extractions systems, North Site Cover, etc.).

The following positions are related to O&M activities at the facility:

Job Title	Duties/Description
1. FMC Remediation Manager	Manages the O&M Contractor performing the work, provides environmental support/guidance, and assures that operations are in compliance with the Part 373 Permit.
2. O&M Contractor Project Manager	Directs, coordinates, and assures day-to-day operations are carried out to keep the WSI and ICMs operational and in compliance with the Part 373 Permit. Ensures maintenance work and appropriate inspections are conducted.
3. O&M Contractor Safety Manager	Provides direction and oversight to the O&M Contractor and support staff.
4. O&M Contractor Operations and Maintenance Personnel	Operates and performs routine maintenance of the WSI and other facility ICMs as specified in the associated O&M plans required under the Part 373 Permit. Performs inspections and maintains associated information necessary for operating record.
5. O&M Contractor Sampling and Monitoring Staff	Performs field monitoring, water level measurements and sampling for chemical analysis.

Personnel will complete introductory training relevant to their job title/position within six months of their employment or assignment to a new position. Employees will not work in unsupervised positions until they have completed the training required for their respective position.

Personnel take part in continuing education (refresher) training relevant to their job title/position.

1.2 Relevance of Training to Job Position

All FMC employees and O&M Contractor employees working within the facility will undergo initial, specialized, specific and annual training programs, depending upon their job positions. This will be accomplished via classroom, hands-on, and specific on-the-job training, to ensure compliance with 373-2.2(h)(1)(i), as it is relevant to their positions. A qualified instructor trained in hazardous waste management procedures will direct the training program. The following identifies training type for the job positions identified in Section 1.1.

Training Type	Job Titles*				
	1	2	3	4	5
OSHA 1910.120 HAZWOPER 40-hour and annual refresher training	X	X	X	X	X
RCRA Hazardous Waste Generator and Manifest requirements		X		X	
DOT Hazardous Material General Awareness		X		X	
FMC Plant Facility and Safety Orientation Training, including plant emergency communications/alarm and evacuation procedures	X	X	X	X	X
FMC Plant emergency/spill response plans and Contingency Plan implementation, including response to spills and fires or explosions		X	X	X	
WSI and On-going ICMs Operations:					
• Operating procedures		X		X	
• Shutdown of operations		X		X	
• Procedures for using, inspecting repairing and replacing emergency and monitoring equipment		X		X	
Note: * Refers to job title number in Section 1.1					

1.3 Training Content, Frequency and Techniques

The facility’s training programs consist of introductory and continuing education training programs for personnel relevant to their job title/position. The training programs consist of a combination of classroom instruction and on-the-job training including instruction on hazardous waste management procedures to enable employees to responsibly perform their job-specific duties. In addition, the training programs are designed to ensure that facility personnel are familiar with the implementation of the facility’s RCRA Contingency Plan and are able to respond effectively to emergencies.

Facility personnel successfully complete the training required for their job-specific position within six months after the date of their employment or assignment to the facility. Employees are not allowed to work in unsupervised positions until they have completed the training required for their position. Facility personnel take part in an annual review of the initial training relevant to their position.

An outline of the training programs is provided in Exhibit A of this Personnel Training Plan.

1.4 Training Director

Training will be conducted by a reputable outside firm experienced in the appropriate training courses (e.g., HAZWOPER, DOT, etc.) and/or by the O&M Contractor Safety Manager or other safety professional trained and experienced in the appropriate training topics.

At the completion of initial training and each annual course, the Training Director (qualified safety personnel) certifies that each employee has successfully completed the program. Training may also be conducted by a reputable outside firm experienced in the appropriate training courses (e.g., HAZWOPER, DOT, etc.).

2.0 IMPLEMENTATION OF TRAINING PROGRAM

All current employees of the facility have been fully trained. All future employees will complete their training within 6 months of their employment or assignment to any hazardous waste emergency response function or hazardous waste management activity. New employees are not permitted to work unsupervised until they have completed the training program.

Training records shall be maintained and made available to the NYSDEC upon request. These records should identify the employee name, job title, education, and years of service and include copies of certificates documenting successful completion of training courses.

FMC or its O&M Contractor will maintain the following records at the facility for each position related to hazardous waste management:

- Job titles and names of employees filling each job position;
- Written job descriptions;
- Written description of type and amount of training given to each position;
- Documentation that training has been given to and completed by facility personnel, both for initial training and the subsequent annual refreshers; and
- Records that document that the training has been given to, and completed by, facility personnel.

Training records will be maintained for current personnel until closure of the facility. Training records for former personnel will be kept for a minimum of three years after the last date of employment.

3.0 GLOSSARY

<u>Term</u>	<u>Definition</u>
6 NYCRR	Title 6 of the New York Codes, Rules and Regulations
DOT	United States Department of Transportation
ESI	Eastern Surface Impoundment
FMC	FMC Corporation
HAZCOM	HAZard COMmunication
HazMat	Hazardous Materials
HAZWOPER	HAZardous Waste OPERations and Emergency Response
ICM	Interim Corrective Measure
LDR	Land Disposal Restriction
LP	Liquid Propane
SDS	Safety Data Sheets
NYSDEC	New York State Department of Environmental Conservation
O&M	Operations and Maintenance
OSHA	Occupational Safety and Health Administration
PPE	Personal Protective Equipment
RCRA	Resource Conservation and Recovery Act
TSCA	Toxic Substances Control Act
WSI	Western Surface Impoundment

Exhibit A
TRAINING PROGRAM OUTLINE

A. Outline for Introductory Training Program

a. Occupational Safety and Health Administration (OSHA) HAZardous Waste Operations and Emergency Response (HAZWOPER) (40-hour course)

- i. Worker protection regulations (OSHA 1910.120)
- ii. Safety Considerations/Principles
- iii. Hazard Recognition and Evaluation
- iv. Chemical Hazards
- v. Terminology
- vi. Toxicology
- vii. Hazard Communication
- viii. Personal Protection Equipment
 - 1. Levels of protection
 - 2. Respiratory protection
 - 3. Protective clothing
- ix. Drum Handling Procedure
- x. Emergency Response

b. Resource Conservation and Recovery Act (RCRA) Waste Generator

- i. Regulatory History
- ii. Laws and Regulations Governing Hazardous Waste Management
- iii. Hazardous Waste Identification
 - 1. Listings
 - 2. Characteristic codes
 - 3. State codes
- iv. Paperwork Requirements

c. RCRA Waste Manifest Training

- i. History and Purpose
- ii. Manifest Fields
- iii. Discrepancies and Rejections
- iv. Distribution Summary
- v. Profile Sheets (Lab Pack and Containerized Waste)
- vi. Packing Slips
- vii. Land Disposal Restrictions (LDRs)
- viii. Exception Reporting
- ix. Recordkeeping

d. United States Department of Transportation (DOT) Hazardous Materials (HazMat) General Awareness

- i. Training Requirements
 - 1. Hazmat Employees
 - 2. Training Frequency
- ii. Hazard Class Definitions
- iii. Shipping Names

- iv. Packaging
- v. Marking/Labeling
- vi. Shipping Papers
- vii. Placarding
- viii. Loading/Segregation
 - 1. Segregation chart
 - 2. Exemptions
 - 3. Handling, loading, unloading, securing and storing hazardous materials

e. FMC Plant Facility Orientation

- i. Facility History and Permits
 - 1. History of the facility
 - 2. Part 373 Permit
- ii. Storage of Materials within the Facility
 - 1. Storage for ignitable and reactive wastes
 - 2. Segregation of incompatible wastes
 - 3. Liquid propane (LP) storage

f. FMC Plant Safety Orientation

- i. Safety Orientation
 - 1. Introduction
 - 2. Facility rules
 - 3. Emergency Action and Fire Prevention Plan
 - 4. Fire extinguisher awareness
 - 5. Incident/injury investigation and reporting
- ii. Personal Protective Equipment (PPE)
 - 1. Eye and face protection
 - 2. Head protection
 - 3. Foot protection
 - 4. Hand protection
 - 5. Hearing protection
 - 6. Personal protection levels
- iii. Respiratory Protection
- iv. Blood borne Pathogens
- v. HAZard COMMunication Program (HAZCOM)
 - 1. Purpose of HAZCOM
 - 2. Safety Data Sheets (SDSs)
 - 3. Vendor safety
 - 4. Labeling
 - 5. Review of chemicals at facility
- vi. Back Safety
- vii. RCRA Contingency Plan
 - 1. Emergency and evacuation procedures
 - a. Response to fires or explosions
 - b. Response to groundwater contamination incidents
 - c. Shutdown of operations
 - d. Key parameters for automatic waste feed cutoff systems
 - 2. Location of emergency equipment and PPE
 - 3. Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment

- 4. Emergency Coordinators and notification numbers
- viii. Emergency/spill response procedures in facility plans
 - 1. Spill Prevention, Control and Countermeasure Plan
 - 2. Spill Prevention Report
 - 3. Best Management Practices Plan
- g. **WSI Operations and On-going ICMs**
 - i. WSI Operations Plan
 - ii. North Site Cover O&M Plan
 - iii. Groundwater Extraction System O&M Plan
 - iv. OM&M Plans for North Railroad Property, Wooded Parcel, and Culvert 105 MH-N9

B. Outline for Continuing Education Program

- a. **OSHA 8-Hour Refresher (this course is required annually)**
 - i. Regulatory Update
 - ii. Hazard Recognition and Evaluation
 - iii. Review of Levels of Personal Protection
 - 1. Chemical protective clothing
 - 2. Respiratory protection
 - 3. Selection and use
- b. **Facility Refresher (this course is required annually)**
 - i. Waste Characterization and Identification, Waste Acceptance Procedures, Commingling Wastes, Segregation of Incompatible Wastes
 - ii. Emergency/spill response procedures and plans RCRA Contingency Plan Review
 - iii. Mock Emergency Drill
- c. **RCRA (this course is required annually)**
 - i. Regulatory Updates
 - 1. Laws and regulations governing hazardous waste management and disposal
 - ii. Hazardous Waste Identification
 - 1. Listings
 - 2. Characteristic codes
 - 3. State codes
 - iii. Paperwork Requirements