

MiOps Environmental Operations HWC MACT Training Program

Scope

This document is to define the training requirements for EVO employees within Michigan Operations under the Hazardous Waste Combustor MACT (HWC MACT) rules. Complying with this policy will ensure compliance with regulatory training requirements.

Hazards and precautions

The table below lists job hazards and the precautions that should be taken for safety, environmental, quality, ergonomics, Good Manufacturing Practices, etc... before beginning this procedure.

Hazard	Precaution
Inconsistency between employees	Utilize policy and timelines
Regulatory deviation with potential fines and penalties.	Follow training policy

Tools and equipment

The tools and equipment listed below are needed to do this job.

Tool/Equipment	Use (if explanation is needed)
MyLearning	E-learning is conducted/tracked in this online system.
EVO OEM Learner Spreadsheet	Operators learning the Panel (OEM Level 3) will use the learner spreadsheet to view their learning requirements for MACT training.

Before you begin

Employees will complete their New Member Integration (NMI) Checklist before starting OEM. The employee will be assigned day shift their first two weeks at EVO and is expected to complete their NMI checklist during this time. Once completed, the employee will schedule a follow-up meeting with the Operational Excellence Specialist (OES) to review their completed checklist and identify any issues/concerns, as well as to assure GHRIS credit is assigned.

Consequences of Deviation

Consequences of deviation and how to avoid them are listed here:

Type of Deviation	Consequences and How to Avoid
Not following procedure	Potential dismissal from EVO if the individual has not completed their training in the allotted time specified.

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Site Specific HWC MACT Training	GHRIS Code	Activity
Initial Certification for Panel/Board operators EVO Midland Kiln MACT Initial Certification – GHRIS J642		<p>MACT Hazardous Waste Incineration: Site Specific HWC MACT Training</p> <p>Control room operators must obtain initial HWC-MACT certification by passing a test on this material. They must complete a separate annual HWC-MACT refresher course to maintain certification (See GHRIS Code 260832_365).</p> <p>At MIOPS EVO, the Kiln Run Plant Engineer and Technical Advisors will complete the same training requirements as the panel/board operators.</p>
Initial Training - Abbreviated version EOB-Midland Kiln MACT Training – GHRIS 260832		<p>MACT Hazardous Waste Incineration: Site Specific HWC MACT Training</p> <p>Other categories of personnel (See the Training Matrix) must be initially trained by passing a test on this material. Refresher HWC-MACT training is not required for these other categories of personnel.</p>
Annual Refresher Training EOB-Midland Kiln MACT Training Annual Refresher – GHRIS 260832_365		<p>Panel/board operators must complete an annual HWC-MACT refresher course to maintain certification. (They must obtain initial HWC-MACT certification by completing the initial certification training given covered under GHRIS Code J642.)</p> <p>At MIOPS EVO, the Kiln Run Plant Engineer and Technical Advisors will complete the same training requirements as the control room operators.</p>

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Training matrix

Role	Responsibilities	Required Training
EH&S Delivery Leader	<ul style="list-style-type: none"> Overall EH&S responsibility Understanding of RCRA Contingency Plan (Emergency Coordinator or alternate) 	Initial/Annual RCRA training <ul style="list-style-type: none"> Federal & State Initial HWC-MACT training <ul style="list-style-type: none"> GHRIS 260832
EH&S Delivery Specialist and Technician (with responsibility for the kiln)	Ensuring required inspections are performed, records/reports generated, and RCRA/HWC-MACT filing system is maintained.	Initial/Annual RCRA training <ul style="list-style-type: none"> Federal & State Initial HWC-MACT certification <ul style="list-style-type: none"> GHRIS J642 Annual HWC-MACT refresher recertification <ul style="list-style-type: none"> GHRIS 260832_365
Kiln Technical Staff <ul style="list-style-type: none"> Kiln Run Plant Engineer Kiln TA WWTP TA (back-up for kiln TA) 	Performance of RCRA tasks <ul style="list-style-type: none"> Inspections Response to emergencies Waste generation Support operations for the combustor	Initial/Annual RCRA training <ul style="list-style-type: none"> Federal & State Initial HWC-MACT certification <ul style="list-style-type: none"> GHRIS J642 Annual HWC-MACT refresher recertification <ul style="list-style-type: none"> GHRIS 260832_365
EVO staff <ul style="list-style-type: none"> Production Leader Operations Leader Waste schedulers (including back-up) EVO Tech Center personnel SSRP personnel 	Performance of RCRA tasks <ul style="list-style-type: none"> Inspections Response to emergencies Waste generation Support operations for the combustor	Initial/Annual RCRA training <ul style="list-style-type: none"> Federal & State Initial HWC-MACT training <ul style="list-style-type: none"> GHRIS 260832

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**Training matrix
(continued)**

Role	Responsibilities	Required Training
Kiln panel/board operators	Performance of RCRA tasks <ul style="list-style-type: none"> • Inspections • Response to emergencies • Waste generation Combustor operation	Initial/Annual RCRA training <ul style="list-style-type: none"> • Federal & State Initial HWC-MACT certification <ul style="list-style-type: none"> • GHRIS J642 Annual HWC-MACT refresher recertification <ul style="list-style-type: none"> • GHRIS 260832_365
Kiln Operations Personnel	Performance of RCRA tasks <ul style="list-style-type: none"> • Inspections • Response to emergencies • Waste generation Combustor operation	Initial/Annual RCRA training <ul style="list-style-type: none"> • Federal & State Initial HWC-MACT training <ul style="list-style-type: none"> • GHRIS 260832
Instrument, electrical, analyzer maintenance technicians	Install, calibrate, maintain combustor continuous monitoring systems (CEMS and CPMS)	RCRA training N/A because they do not manage hazardous waste Initial HWC-MACT training (CMS course - training given by instrument group)