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		Department:	Operations
		Revision Date:	06 APR 2010
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Purpose

Trinity Medical Management ("Trinity") has developed this HAZWOPER RCRA Program to clean up and/or properly handle hazardous wastes, because they can pose significant safety and health risks to our workers and those of our subcontractors, when not handled properly.

Administration

The Training and Compliance Manager (TCM) is responsible to the implementation and maintenance of this program. A copy of the HAZWOPER RCRA Safety Program is located in the Operations office.

General

HAZWOPER is a complicated regulation, with many different elements required. At Trinity we have done a thorough job of complying with the many aspects of HAZWOPER.

Because we have employees who are responsible for responding to chemical spills, our facility has developed a detailed Emergency Response Plan. See the attached plan.

Because of the exposures and potential exposures that workers can have at our facility, we maintain a Medical Surveillance Program, under HAZWOPER. See attached plan.

Because employees use a variety of types of PPE and/or respiratory equipment, in their day-to-day operations, or in the event of a chemical spill, we needed to develop a PPE and/or Respiratory Protection plans. See attached plans.

The TCM is in charge of the HAZWOPER safety and health programs.

Safety & Health Program

The company has developed this safety and health program for employees involved in hazardous waste operations. The program is designed to identify, evaluate and control safety & health hazards & provide for emergency response. The program details a specific chain of command, address task & objectives of the operations and address site specific procedures.

Employee Protection

Engineering controls, work practices, and personal protective equipment for employee protection. Engineering controls, work practices, personal protective equipment, or a combination of these shall be implemented in accordance with this paragraph to protect employees from exposure to hazardous substances and safety and health hazards.

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Engineering controls and work practices shall be instituted to reduce and maintain employee exposure to or below the permissible exposure limits, except to the extent that such controls and practices are not feasible.

Engineering controls which may be feasible include the use of pressurized cabs or control booths on equipment, and/or the use of remotely operated material handling equipment. Work practices which may be feasible are removing all non-essential employees from potential exposure during opening of drums, wetting down dusty operations and locating employees upwind of possible hazards.

Whenever engineering controls and work practices are not feasible, or not required, any reasonable combination of engineering controls, work practices and PPE shall be used to reduce and maintain to or below the permissible exposure limits or dose limits.

The employer shall not implement a schedule of employee rotation as a means of compliance with permissible exposure limits or dose limits except when there is no other feasible way of complying with the airborne or dermal dose limits for ionizing radiation.

Medical Surveillance

Trinity has established a medical surveillance program for employees who may be exposed to health hazards for 30 days or more a year or wear a respirator 30 or more days a year. The program is provided at no cost to our employees.

Decontamination

Decontamination procedures are communicated to employees and implemented before any employees or equipment may enter areas on site where potential for exposure to hazardous substances exists. Standard operating procedures are developed to minimize employee contact with hazardous substances or with equipment that has contacted hazardous substances.

All employees leaving a contaminated area are appropriately decontaminated; all contaminated clothing and equipment leaving a contaminated area is appropriately disposed of or decontaminated.

Decontamination procedures shall be monitored by the site safety and health supervisor to determine their effectiveness. When such procedures are found to be ineffective, appropriate steps shall be taken to correct any deficiencies.

Location

Decontamination is performed in geographical areas that will minimize the exposure of uncontaminated employees or equipment to contaminated employees or equipment.

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Equipment and Solvents

All equipment and solvents used for decontamination is decontaminated or disposed of properly.

Personal Protective Clothing and Equipment

Protective clothing and equipment is decontaminated, cleaned, laundered, maintained or replaced as needed to maintain their effectiveness.

Employees whose non-impermeable clothing becomes wetted with hazardous substances will immediately remove that clothing and proceed to shower. The clothing shall be disposed of or decontaminated before it is removed from the work zone.

Unauthorized employees. Unauthorized employees will not remove protective clothing or equipment from change rooms.

Commercial Laundries or Cleaning Establishments

Commercial laundries or cleaning establishments that decontaminate protective clothing or equipment will be informed of the potentially harmful effects of exposures to hazardous substances.

Showers and Change Rooms

Where the decontamination procedure indicates a need for regular showers and change rooms outside of a contaminated area, they will be provided and meet the requirements of 29 CFR 1910.141. If temperature conditions prevent the effective use of water, then other effective means for cleansing shall be provided and used.

Site Control

Appropriate site control procedures will be implemented to control employee exposure to hazardous substances before clean-up work begins.

A site control program for protecting employees which is part of the Company's site safety and health program will be developed during the planning stages of a hazardous waste clean-up operation and modified as necessary as new information becomes available.

The site control program shall, as a minimum, include:

- A site map;
- Site work zones;
- The use of a "buddy system";
- Site communications including alerting means for emergencies;
- The standard operating procedures or safe work practices; and,
- Identification of the nearest medical assistance.

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HAZWOPER Training Program

Equipment operators, general laborers, supervisors and management, etc., must be trained prior to being allowed to participate in or supervise field activities. As part of the HAZWOPER program, this facility has developed and implemented a program to inform workers (including contractors and subcontractors) performing hazardous waste or emergency response operations of the level and degree of exposure they are likely to encounter.

This company has also implemented procedures for introducing effective new technologies that provide improved worker protection in hazardous waste operations and spill/leak cleanup. Examples include PPE, foams, absorbents, adsorbents, neutralizers, etc.

Training makes workers aware of the potential hazards they may encounter and provides the necessary knowledge and skills to perform their work with minimal risk to their safety and health.

Both supervisors and workers are trained to:

- Recognize hazards and to prevent them;
- Select, care for, and use respirators properly as well as other types of personal protective equipment;
- Work practices which minimize hazardous risks;
- Safe use of engineering controls and equipment;
- Understand engineering controls and their use;
- Use proper decontamination procedures;
- Understand the Emergency Response Plan, medical surveillance requirements, confined space entry procedures, spill containment program, and any appropriate work practices.
- Workers also must know the names of personnel and their alternatives responsible for site safety and health.

The amount of instruction differs with the nature of the work operations. Employees must not perform any hazardous waste or emergency response operations unless they have been trained to the level required by their job function and responsibility and have been certified by their instructor as having completed the necessary training. All emergency responders must receive refresher training sufficient to maintain or demonstrate competency annually. Employee training requirements are further defined by the nature of the work (e.g., temporary emergency response personnel, firefighters, safety officers, HAZMAT personnel, incident commanders, etc.)

At our facility, the TCM is the person responsible for conducting training. We make a determination as to who to train by using the following criteria:

- All employees working on site (such as but not limited to equipment operators, general laborers and others) exposed to hazardous substances, health hazards, or safety hazards and their supervisors and management responsible for the site shall receive training before they are permitted to engage in

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hazardous waste operations that could expose them to hazardous substances, safety, or health hazards, and they shall receive review training.

- Employees are not permitted to participate in or supervise field activities until they have been trained to a level required by their job function and responsibility.

We want to offer the best training for our workers, so the format of the program that is used is audiovisual, classroom instruction, and practical (hands-on) instruction.

The training will thoroughly cover the following:

- Names of personnel and alternates responsible for site safety and health;
- Safety, health and other hazards present on the site;
- Use of personal protective equipment;
- Work practices by which the employee can minimize risks from hazards;
- Safe use of engineering controls and equipment on the site;
- Medical surveillance requirements, including recognition of symptoms and signs which might indicate overexposure to hazards; and

The procedure to train new employees at the time of their initial assignment is:

- General site workers (such as equipment operators, general laborers and supervisory personnel) engaged in hazardous substance removal or other activities which expose or potentially expose workers to hazardous substances and health hazards shall receive a minimum of 40 hours of instruction off the site, and a minimum of three days actual field experience under the direct supervision of a trained, experienced supervisor.
- Workers on site only occasionally for a specific limited task (such as, but not limited to, ground water monitoring, land surveying, or geophysical surveying) and who are unlikely to be exposed over permissible exposure limits and published exposure limits shall receive a minimum of 24 hours of instruction off the site, and the minimum of one day actual field experience under the direct supervision of a trained, experienced supervisor.
- Workers regularly on site who work in areas which have been monitored and fully characterized indicating that exposures are under permissible exposure limits and published exposure limits where respirators are not necessary, and the characterization indicates that there are no health hazards or the possibility of an emergency developing, shall receive a minimum of 24 hours of instruction off the site and the minimum of one day actual field experience under the direct supervision of a trained, experienced supervisor.
- Workers with 24 hours of training and who become general site workers or who are required to wear respirators, shall have the additional 16 hours and two days of training.

Management and Supervisor Training

On-site management and supervisors directly responsible for, or who supervise employees engaged in, hazardous waste operations shall receive 40 hours initial training, and three days of

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supervised field experience (the training may be reduced to 24 hours and one day if the only area of their responsibility is employees covered by paragraphs (e)(3)(ii) and (e)(3)(iii)) of OSHA 1910.120 and at least eight additional hours of specialized training at the time of job assignment on such topics as, but not limited to, the Company's safety and health program and the associated employee training program, personal protective equipment program, spill containment program, and health hazard monitoring procedure and techniques. Tracking the training and retraining will be accomplished by the Training and Compliance Manager.

Certificates signed by employees are handed out upon completion of their training. Employees at all hazardous waste sites have been trained to the level required by their job function and responsibility prior to performing any hazardous waste operation.

All emergency responders have received refresher training sufficient to maintain or demonstrate competency annually.

We provide for pre-entry briefing to be held prior to initiating any site activity, and at such other times as necessary to ensure that employees are apprised of the site safety and health plan.

We ascertain that this plan is being followed by Routine Inspections. If a problem with the plan being followed is identified the employees involved will receive additional training.

Organizational Structure

The TCM is the general supervisor who has the responsibility and authority to direct all hazardous waste operations.

The Operations Manager is the site safety and health supervisor who has the responsibility and authority to develop and implement the site safety and health plan and verify compliance.

Other personnel who are needed for hazardous waste site operations and emergency response are

- A general supervisor who has the responsibility and authority to direct all hazardous waste operations.
- A site safety and health supervisor who has the responsibility and authority to develop and implement the site safety and health plan and verify compliance.

All other personnel needed for hazardous waste site operations and emergency response.

- Incident Commander
- Safety Officer
- Operations Manager
- Scribe
- Public Information Officer
- Security
- Medical
- Decon (decontamination)

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- First Responders
- Support Personnel

Our organizational structure is reviewed and updated as necessary to reflect the current status of waste site operations.

Site-Specific Safety and Health Plan

Our site-specific safety and health plan is a program that aids in eliminating or effectively controlling anticipated safety and health hazards. The site safety and health plan identifies the hazards of each phase of the specific site operation and is kept on the work site. The site safety and health plan addresses the safety and health hazards of each phase of site operation and includes the requirements and procedures for employee protection.

We have a safety and health risk or hazard analysis for each site task and operation identified in the work plan.

Personal protective equipment is used by employees for some of the site tasks and operations being conducted. See the attached Personal Protective Equipment Plan for details.

Air Monitoring

Air monitoring shall be used to identify and quantify airborne levels of hazardous substances and safety and health hazards in order to determine the appropriate level of employee protection needed on site.

Initial Entry

Upon initial entry, representative air monitoring shall be conducted to identify any IDLH condition, exposure over permissible exposure limits or published exposure levels, exposure over a radioactive material's dose limits or other dangerous condition such as the presence of flammable atmospheres or oxygen-deficient environments.

Periodic Monitoring

Periodic monitoring shall be conducted when the possibility of an IDLH condition or flammable atmosphere has developed or when there is indication that exposures may have risen over permissible exposure limits or published exposure levels since prior monitoring. Situations where it shall be considered whether the possibility that exposures have risen are as follows:

- When work begins on a different portion of the site.
- When contaminants other than those previously identified are being handled.
- When a different type of operation is initiated (e.g., drum opening as opposed to exploratory well drilling).
- When employees are handling leaking drums or containers or working in areas with obvious liquid contamination (e.g., a spill or lagoon).

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Personnel Monitoring

Monitoring of high-risk employees. After the actual clean-up phase of any hazardous waste operation commences; for example, when soil, surface water or containers are moved or disturbed; the Company shall monitor those employees likely to have the highest exposures to hazardous substances and health hazards likely to be present above permissible exposure limits or published exposure levels by using personal sampling frequently enough to characterize employee exposures. If the employees likely to have the highest exposure are over permissible exposure limits or published exposure limits, then monitoring shall continue to determine all employees likely to be above those limits. The Company may utilize a representative sampling approach by documenting that the employees and chemicals chosen for monitoring are based on the criteria stated above.

Our spill containment program is as follows:

Trinity will respond to nearly every type of chemical release or spill with the exception of radiation or explosives. Refer to our HAZWOPER Emergency Response and Contingency Plans for complete details.

The work plan is kept Operations Office and/or Site Office. We conduct inspections to detect deficiencies in the site safety and health plan. Inspections are conducted by the site safety and health supervisor or, in the absence of that individual, another individual who is knowledgeable in occupational safety and health, acting on behalf of the Company as necessary to determine the effectiveness of the site safety and health plan. Any deficiencies in the effectiveness of the site safety and health plan shall be corrected by the Company.

Contractor Safety

Contractors working at our facility need to be protected from hazards that may be on our premises. Because we use contractors' or subcontractors' services for work in hazardous waste operations, we have informed them of the site emergency response procedures and any potential fire, explosion, health, safety, or other hazards of the operation.

We routinely make the written safety and health program available to any contractor who will be involved with the hazardous waste operation.