



HAZARDOUS WASTE TRAINING PLAN

FLORIDA INSTITUTE OF TECHNOLOGY

**150 WEST UNIVERSITY BOULEVARD
MELBOURNE, FLORIDA**

EPA I.D. #FLD053396669

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**FLORIDA INSTITUTE OF TECHNOLOGY
150 West University Boulevard
MELBOURNE, FLORIDA**

1.0 INTRODUCTION

Florida Institute of Technology located at 150 West University Boulevard in Melbourne, Florida is an independent technological university that provides education through basic and applied research. Areas of academic study at the university include:

- Engineering (aerospace, chemical, civil, computer, electrical, marine, environmental, mechanical)
- Science (biology, chemistry, mathematics, physics and space)
- Aeronautics (airport management and development, flight training, live tower communication)

Research institutes and centers at the university include:

- Biological and Biomedical Sciences
- Energy Systems
- Materials Science and Nanotechnology
- Marine Research
- National Center for Hydrogen Research

To a lesser extent various liberal arts studies are also taught.

Florida Institute of Technology was founded in 1958 and is located on 130 acres in the vicinity of the Indian River and Atlantic Ocean. Student enrollment at the university is approximately 4,800.

2.0 PURPOSE

40 CFR 262.34(d)(5)(iii)

“The generator must insure that all employees are thoroughly familiar with proper waste handling and emergency procedures relevant to their responsibilities during normal facility operations and emergencies;”

40 CFR 265.16(a)(1)

“facility Personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility’s compliance with the requirements of this part. The owner or operator must ensure that this program includes all the elements described in the document required under paragraph (d)(3) of this section.”

40 CFR 265.16(d)(1),(2),(3)

“The owner or operator must maintain the following documents and records at the facility:

(1) The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job;

(2) A written job description for each position listed under paragraph (d)(1) of this Section. This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but must include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position;

(3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (d)(1) of this Section;

The Purpose of this training plan is two fold:

(1) To act as a guide to the implementation of Hazardous waste training at Florida Tech.

(2) To document the Hazardous Waste training activities at Florida Tech.

3.0 2007 Training Activities

3.1 Pre-FDEP Feb 2007 Inspection Training

Greg Peebles was given the position of Interim Safety Director in January of 2006. One of Mr. Peebles' first actions was to receive Training in areas he was not current in. Certificates of this training are in Appendix A. These were conducted by "Environmental Resource Center" of NC in Atlanta, Ga.:

Hazardous Waste Management per CFR 265.16	Feb 21-22, 2006
DOT Hazardous Materials Training	Feb 23, 2006
SARA Title III	Feb 24, 2006

As a result of these trainings Mr. Peebles Prepared a summary of items of needed correction at Florida Tech over the next 8 months and presented his report to FIT management in Nov of 2006

3.2 EPA/ICUF Auditor Training

In late February of 2007, as part of an EPA Self Audit initiative for Florida Universities & Colleges, Florida Tech Joined the Institute of Colleges and Universities of Florida's (ICUF) program of Peer auditing with the assistance of Halloran & Sage LLP and HRP Associates Inc. as they had completed a similar program last year in the northeast. Pursuant to this Florida Tech had the following people trained as Peer Auditors at the end of May:

Greg Peebles – Director, University Safety Office

Scott Weber – Supervisor, Building Maintenance and Operations – Facilities

Stephanie Hopper – Director, Engineering Laboratories

Gil Virulet – Ground Safety Manager – FIT Aviation

Rick Leniek – Stockroom Manager – Chemistry Department

This training centered in on the use of Hardware and software developed by HRP to perform an Audit of all areas of interest to USEPA in their investigations of Universities and Colleges. RCRA was an area touched on, but so was CERCLA, CWA, CAA, TSCA, SPCC, and others

This training, while informative, was not looked at as sufficient to cover the requirements of the regulations cited in 2.0 above.

3.3 RCRA Training in 2007

March 19, 2007 2:30 to 4:30 – Mr. Peebles presented a summary of the RCRA issues identified by the FDEP to the entire faculty in the Chemistry Department. Dr. Babich, the Department Head, forcibly indicated that all his staff would review the documents I presented and be in compliance ASAP. They also would modify their individual class safety trainings to reflect the RCRA as discussed. These issues were from the letter worked out between Mr. Peebles & Ms. Bentzen shortly after the 27 Feb 2007 final inspection.

March 28, 2007 3:30 to 5:00 – Mr. Peebles presented a summary of the RCRA issues identified by the FDEP to the entire staff of the College of Engineering. A plan was outlined on how to bring the engineering laboratories into RCRA compliance.

August 23, 2007 METRA held a day long Contractor Environmental Workshop. Florida Tech had the following personnel in attendance:

Greg Peebles – Director, University Safety Office

Stan Zone – Supervisor, Painting – Facilities

Kelly Tsairis – Supervisor, General Maintenance - Facilities

Bill Bailey – Machinist & Machine Shop Foreman – Engineering

Alex Lindsay – Stockroom Manager – Life Sciences

August 24, 2007 12:00 to 12:50 - Mr. Peebles held a RCRA training seminar for ½ the Mechanical & Aerospace Engineering Freshmen.

August 30, 2007 3:30 to 5:00 – Mr. Peebles held a RCRA training seminar for all Life Sciences Graduate Students.

September 5, 2007 4:00 to 4:50 - Mr. Peebles held a RCRA training seminar for all the Mechanical & Aerospace Engineering Seniors.

September 12, 2007 3:00 to 3:50 - Mr. Peebles held a RCRA training seminar for the rest of the Mechanical & Aerospace Engineering Freshmen.

September 24, 2007 5:00 to 5:50 - Mr. Peebles held a RCRA training seminar for all the Electrical and Computer Engineering Seniors.

Copies of the power point outlines for the student trainings is included in Appendix B.

September 27 & 28, 2007 many of the faculty & Staff at Florida Tech received formal Training in Legal Fines & Penalties, RCRA, SPCC, & DOT. This training was in a sequestered classroom off campus setting for 2 days. The certificates of completion of the RCRA training are included in Appendix C. This training was conducted by HRP and Associates Inc. and Halloran & Sage LLP.

The following were formally RCRA Trained at that time:

Rick Leniek – Stockroom Manager – Chemistry

Greg Peebles – Director, University Safety Office

Stephanie Hopper – Director, Engineering Laboratories

Pat Jones – Facility Manager – FIT Aviation

Scott Weber – Supervisor, Building Maintenance and Operations – Facilities

Mike Babich – Department Head & Professor – Chemistry

Kurt Winkelmann – Associate Professor & 2nd Floor Safety Mgr – Chemistry

Rudi Wehmschulte - Associate Professor & 3rd Floor Safety Mgr – Chemistry

Janeene Culver - Procurement Coordinator & Safety Committee Co-Chair –
Facilities

Doug Givens - Supervisor, HVAC & Plumbing - Facilities

Paul Lopez – Grounds Manager – Athletics

Bill Bailey – Machinist & Machine Shop Foreman – Engineering

Barry Bartolino – Supervisor, Landscaping - Facilities

Alex Lindsay – Stockroom Manager – Life Sciences

Stan Zone – Supervisor, Painting – Facilities

Jim Hayes – Supervisor, Electrical - Facilities

Kelly Tsairis – Supervisor, General Maintenance - Facilities

Michael Ducatte – Manager, Rathskeller – Food Services

Edward Martin – Laboratory Assistant – Engineering

Mike Beckert – Manager, Gleason Performing Arts Center – Auxiliary Enterprises

Tim Fletcher – Dock Master – Research

A summary of the materials presented is included in Appendix D.

8 November 2007 A Life Sciences Faculty Meeting was held from 9:00AM to 10:30. A Chemistry Faculty & Graduate Student Meeting was held 10:45 to 12:15. An Engineering Faculty & Graduate Student Meeting was held from 12:30

to 2:00. A Facilities meeting was held from 2:15 to 3:45. Catherine Eichner of HRP was there as the presenter. She reviewed specific RCRA corrective actions for each department as a follow on to the September RCRA training.

In January of 2008 Mr. Peebles discussed some of the Florida Tech 2007 RCRA training with Ms. Bentzen on the telephone. Ms. Bentzen Indicated that it is required that at least Sign In sheets were need as proof of attendance to various trainings. This will be incorporated in all future training sessions.

4.0 RCRA Training Plan 2008 and in the Future

We have determined that addition personnel need to be formally RCRA trained due to their job responsibilities requiring the handling of Hazardous waste. Others are new positions which will require hazardous waste handling. They are:

Carlos Cuevas – Lab Assistant, Marine Science - Engineering

Kevin Graham – Director, Security Department

Tom Hostetler – Work Foreperson, Painting – Facilities

Richard MacKenzie – Supervisor, Transportation – Facilities

Mark Peters – Supervisor, Grounds & Landscaping - Facilities

These employees have been registered to attend RCRA & DOT Training by HRP Associates, Inc on March 31 to April 1 2008 in St. Petersburg.

All of these efforts indicated the need for a plan to assure that training was given to all as indicated by the CFRs identified in 2.0 above and maintained into the future.

THE PLAN

During 2007 interviews were held with Department Heads, Faculty, Staff, Deans, & Administration to determine a better system to assure training as required by the CFRs. This is the results.

Undergraduate Students – Training will continue to be conducted in each class given where hazardous waste will be generated. This training will be conducted by the instructor (Faculty, Staff, or Graduate Student) of each course. When the specific lecture including this RCRA training is given sign-in sheets will be generated. Any students registered for a given class will be required to attend a make-up session if they miss this session. They will not be allowed to participate in the class activities that generate hazardous wastes until they have attended the hazardous waste instruction specific to their class and signed to verify that attendance.

Facilities Trades – Training will be conducted by The University Safety Officer every 90 days in 1 hour sessions. These will be annual for all personnel in the Paint, Plumbing, and Maintenance Departments and then for new hires in the same departments. Sign-in sheets will be kept.

Graduate Students – Training will be conducted by the University Safety Officer twice a year in 12 sessions of 1-1/2 hours. These will be in 2 sessions for Chemistry, Life Science, and Engineering at the beginning of the Summer Term (6 sessions) and in 2 sessions for Chemistry, Life Science, and Engineering Just before the beginning of the Fall term (6 Sessions). They will be required to sign-in to verify their attendance. We will require that a College of Engineering (COE), College of Science (COS), Center, or Related Research Graduate Student must attend at least one RCRA training session in their discipline per year as long as they are matriculating at Florida Tech. Failure to train will result in inability to Graduate with their MS or PhD.

General COE, COS, and Related Research Faculty & Staff – Training will be conducted by the University Safety Officer twice a year in 4 sessions of 1-1/2 hours. These sessions will be (2) at the beginning of the Summer Term and (2) just before the start of the Fall term. We will require that all COE & COS faculty & staff attend one of these sessions per year (unless they fall into the Direct Handler Category defined next). They will also be required to sign-in as verification of their attendance. Non-attendance will be addressed by the standard faculty disciplinary procedures associated with employee insubordination subject to potential dismissal.

Direct Handlers – Training will be conducted in one annual session held on FIT campus. This will be a full day RCRA training conducted by an outside professional engineering and consulting firm proficient in RCRA training. This firm will have sign-in & issue training certificates. This training will be done during the Summer Session. This will be for any Faculty & staff whose job requires that they directly handle hazardous waste in the process of consolidation from Satellite Accumulation Areas to Central Storage or other aspects of their position that require decisions regarding the handling & disposal of hazardous waste.

5.0 Job Descriptions for Direct Handlers

This section will include the Job Titles as listed in the Florida Tech HR Records, current position occupant as of 8 Feb 2008 (list to be annually revised), General position description, specific responsibilities requiring RCRA training.

Director of The University Safety Office – Financial Affairs

Greg Peebles

Oversight of all EH&S and OSHA activities

All EPA & FDEP Reporting, Hazardous waste disposal contracting, oversight of all hazardous waste handling and training, Hazardous Waste Emergency Coordinator

Director of the Office of Security – Financial Affairs

Kevin Graham

Oversight of all security and personal safety activities

Hazardous Waste Emergency Co-coordinator

Director of Engineering Laboratories – Engineering

Stephanie Hopper

Management & Purchasing for All Engineering Laboratories

Undergraduate hazardous waste training, engineering laboratories SAA oversight and consolidation to central storage

Supervisor, Grounds & Landscaping – Facilities

Mark Peters

Oversight of all campus landscape maintenance (excluding athletic fields)

Management of disposal of landscaping chemicals

Supervisor, Grounds & Landscaping – Athletics

Paul Lopez

Oversight of all athletic field landscape maintenance

Management of disposal of landscaping chemicals

Supervisor, Transportation – Facilities

Richard Mackenzie

Oversight of all vehicle maintenance and fuels operations

Management of Transportation SAA (Antifreeze, parts washer fluids & Used oil)

Supervisor, Building Maintenance and Operations – Facilities

Scott Weber

Oversight of all Facilities activities except landscaping

Holding all facilities personnel accountable to RCRA standards

Stockroom Manager – Chemistry

Rick Lenick

Management & Purchasing of Chemicals and oversight of all work study students in the Chemistry Department

Management of all Chemistry SAAs & Consolidation to Central Storage

Stockroom Manager – Life Sciences

Alex Lindsay

Management & Purchasing of Chemicals in the Life Sciences Department

Management of all Life Sciences SAAs & Consolidation to Central Storage

Manager, Gleason Performing Arts Center – Auxiliary Enterprises

Mike Beckert

Control and Management of the Performing Arts Center

Oversight of student prop and production construction and disposal

Manager, Rathskeller – Food Services

Michael Ducatte

Management of all Food service activities

Disposal of used oil and cleaning chemicals

Dock Master – Research

Tim Fletcher

Oversight of all Marine equipment and facilities (boats, docks, etc.)

Management of Transportation SAA (Antifreeze, parts washer fluids & Used oil)

Associate Professor & Safety Manager – Chemistry

Kurt Winkelmann

Standard Associate Professor Contract

Chemistry Department Faculty Liaison/Resource person for Hazardous Waste

Laboratory Assistant – Engineering

Edward Martin

Materials Science Laboratories Support

Engineering laboratories SAA oversight and consolidation to central storage

Lab Assistant, Marine Science – Engineering

Carlos Cuevas

Marine & Environmental Laboratories Support

Engineering laboratories SAA oversight and consolidation to central storage

Ground Safety Manager – FIT Aviation

Gil Virulet

Runway equipment and fuels safety

FIT Aviation Paint, fuel, antifreeze, parts washer fluid, & used oil management)

Machinist & Machine Shop Foreman – Engineering

Bill Bailey

Machinist and oversight of all Machine shop activities

Machine Shop SAA oversight and consolidation to central storage

Supervisor, Painting – Facilities

Stan Zone

Coordination and management of all Painting activities

Holding all facilities painter personnel accountable to RCRA standards

Work Foreperson, Painting – Facilities

Tom Hostetler

Painting activities and painting job site oversight

Paint Department SAA oversight and consolidation to central storage