

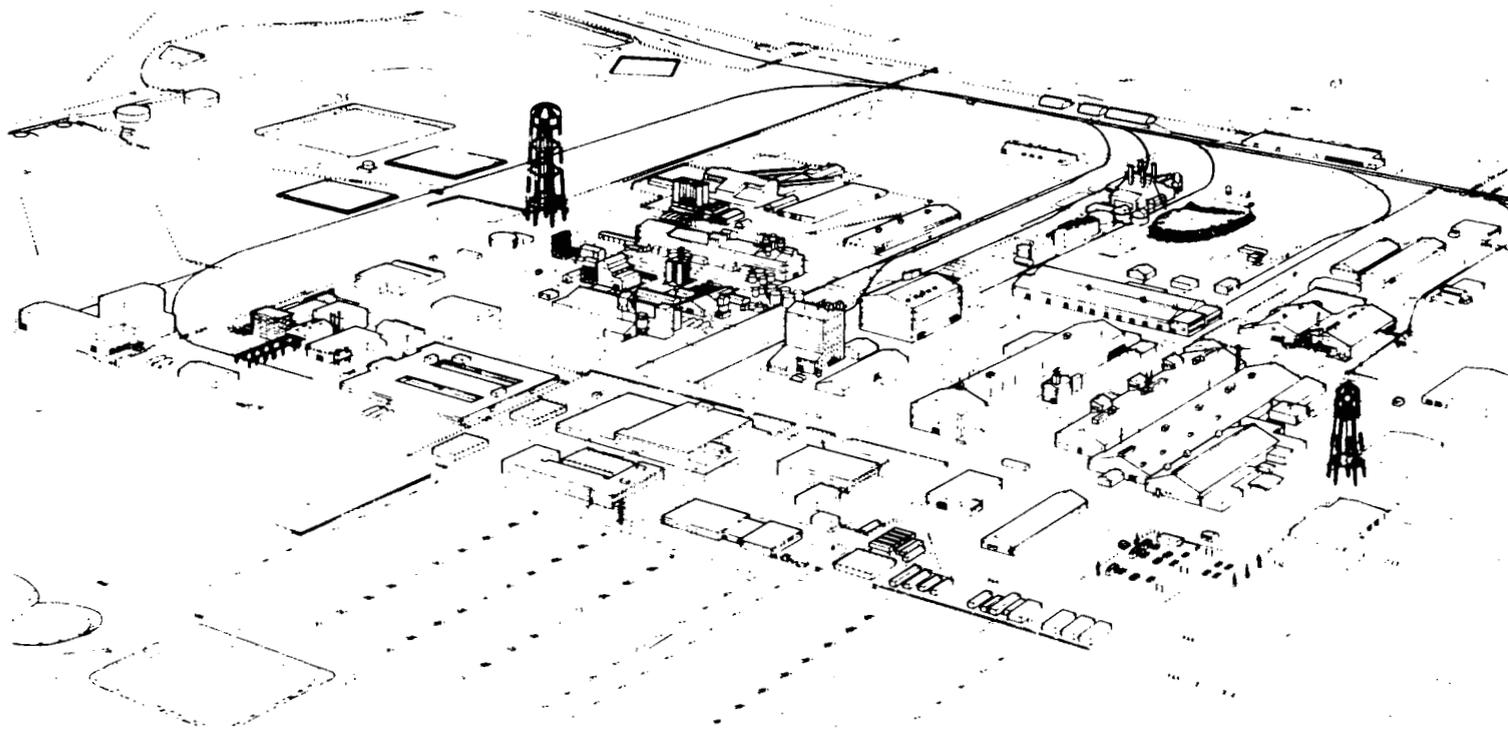
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**RCRA PART B PERMIT APPLICATION SECTION
H: PERSONNEL TRAINING VOLUME 9 OF 11
SEPTEMBER 22, 1990**

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**DOE-FMPC/USEPA
20
APPLICATION**

RCRA PART B PERMIT APPLICATION



SEPTEMBER 22, 1989

SECTION H: PERSONNEL TRAINING

(Volume 9 of 11)

**FEED MATERIALS PRODUCTION CENTER
U.S. DEPARTMENT OF ENERGY
CINCINNATI, OHIO 45239-8705**

U.S. EPA IDENTIFICATION NO. 0H6890008976
OHIO EPA PERMIT NO. 05-31-0681

**RCRA PART B
PERMIT APPLICATION**

SECTION H - PERSONNEL TRAINING

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SECTION H - PERSONNEL TRAINING

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SECTION H - PERSONNEL TRAINING

Part B Permit Application Feed Materials Production Center Fernald, Ohio

A formal training program for hazardous waste personnel has been developed for the Feed Materials Production Center (FMPC) to comply with Federal regulation 40 CFR 270.14(b)(12) and 264.16 and Ohio regulations 3745-50-44(A)(12) and 3745-54-16. This section describes the elements of this training program in the areas of safety, hazardous waste management, facility operations, and emergency response.

Training is essential to the efficient and safe operation of all facility processes and to rapid and effective responses to emergency conditions involving hazardous wastes. It is FMPC's policy that all employees be trained to perform in a manner which emphasizes accident prevention to safeguard human health and the environment.

H-1 Outline of the Training Program

A tri-level, site-wide RCRA Awareness Program is presented yearly to all FMPC employees. A 24-hour core course of information related to 40 CFR 270.14(b)(12) and 264.16 and OAC 3745-50-44(A)(12) and 3745-54-16 and FMPC general RCRA-related operations is presented to all employees whose on-the-job responsibilities involve the management of RCRA hazardous wastes. On-going formal job-specific training is presented to prepare employees to execute FMPC procedures and specific job tasks, some of which relate to RCRA compliance and hazardous waste management. Other on-the-job training is presented outside of the traditional classroom setting to introduce the specific job skills required of individual employees.

These programs are designed in part to address the training requirements for RCRA permitted treatment, storage and disposal facilities described in the OSHA regulations found at 29 CFR 1910.120.

H-1a Job Title/Job Description: The training program an employee receives, including a 24-hour RCRA program and procedures training, is designed to be relevant to each of his or her job tasks involving management of hazardous wastes. Training is tailored to prepare the employee to safely and effectively perform the functions of his/her position and to ensure that the employee will be able to respond effectively to emergency situations at the facility.

H-1b Training Content, Frequency, and Techniques: A comprehensive hazardous waste management training program has been developed for the FMPC. The Manager of the Training and Development Section conducts a one-hour RCRA Awareness Program for all employees at the FMPC. Qualified technical instructors with applicable expertise implement a core 24-hour RCRA training program. The site-wide RCRA Awareness Program and the 24-hour core RCRA training curriculum are designed to conform to the requirements of 40 CFR 270.14(b)(12) and OAC 3745-54-16, and are summarized in Appendix H-1 and H-2.

Continuing, job-specific training is presented for the handling and storage of hazardous waste. For example, four hours of training are offered on the proper operation and inspection of satellite accumulation centers at the facility. Continuing job-specific training is also presented as required by job tasks. For example, 65-card training (the FMPC internal manifest system), storage area inspection training, and drum sampling procedures are taught to employees who perform these duties on an as-needed basis.

On-the-job training is also conducted by qualified technical instructors or supervisors on job tasks specified by Department/Area managers on an on-going basis.

Each new employee is trained in the general orientation and operation of the facility as it relates to hazardous waste management. A training program related to the specific duties of each job is tailored for the position. No employee is permitted to work without supervision until the supervisor or alternate has determined that the employee has successfully completed all elements of the tailored training program. New employees complete the introductory training within six months of their date of employment. A current employee completes this training within six months of assignment to a new position involving hazardous waste management at the FMPC.

As required under 40 CFR 270.14(b)(12) and OAC 3745-54-16, an annual review of the hazardous waste training program is scheduled for facility personnel who work at or oversee hazardous waste operations or whose actions or failure to act may result in noncompliance with RCRA. This 8-hour refresher training is designed to highlight and update the key elements of the 24-hour core training program.

H-1c Training Directors: The Manager of Solid Waste Compliance and the Manager of Training and Development direct hazardous waste management training at the FMPC. The Manager of Solid Waste Compliance has day-to-day involvement in hazardous waste management and regulatory compliance. He or she periodically attends outside courses and/or conferences relevant to hazardous waste management and professional development. The Manager of Training and Development is knowledgeable in training methods and techniques. He or she periodically

attends outside courses and/or conferences relevant to hazardous waste management and professional development.

Specific training on procedures may be conducted by supervisors specified by Department/Area managers, but lesson plans are co-developed with, approved by, and housed in the Training and Development Department. The Department also retains training records for all facility training programs. All instructors and program management personnel are qualified through training and job experience for these tasks, as required by 40 CFR 270.14(b)(12) and OAC 3745-54-16(2).

H-1d Relevance of Training to Job Position: The managers of departments responsible for hazardous waste management were surveyed to determine which employees are involved in RCRA related activities and what these activities are. All such personnel receive RCRA training.

Continuing job-specific training is designed to address specified job tasks and procedures. The degree of continuing job-specific training personnel receive is based on each employee's position and level of responsibility.

All personnel receive training on hazardous waste management, safety practices, and methods to minimize hazardous waste at the FMPC. Specifically involved personnel receive training in record-keeping, inspection requirements, Contingency Plan, sampling, and other required procedures.

H-1e Training for Emergency Responses: The RCRA training program ensures that personnel not only handle wastes in a safe manner but also are able to respond properly to emergency situations. Module 3 (Emergency Procedures) and Module 7 (Regulatory Emergency Planning and Response at FMPC) include all of the

relevant elements of the Contingency Plan presented in Section G of this permit application. The training program also includes, but is not limited to, the following:

° Procedures for Using, Inspecting, Repairing, and Replacing Facility Emergency and Monitoring Equipment:

Facility emergency and monitoring equipment is routinely inspected in accordance with the General Inspection Schedule (Section F). On-the-job training teaches: equipment location; how to inspect, maintain, and use equipment; and how to replace equipment (if necessary) after the emergency is over.

° Key Parameters for Automatic Waste Feed Cut-off Systems:

Because there are no automatic waste feed systems at any hazardous waste management unit, no specialized training for automatic waste feed cut-off system is required. All hazardous wastes are containerized in accordance with DOT specifications.

° Communications or Alarm Systems:

Areas of training with respect to communications or alarm systems include supervision and on-the-job training in types of equipment available at the site and proper use of such equipment, locations of equipment, emergency telephone numbers to be used to summon external assistance, alarm codes, maintenance of the equipment, and frequency of serviceability checks.

° Response to Fires or Explosions:

Specific procedures to be followed in the event of a fire or explosion are outlined in the Contingency Plan. All personnel are trained in their contingency plan responsibilities, evacuation procedures, notification requirements, and means of exit from their respective work areas. Drills are held regularly, and at least annually, to practice these procedures.

Among the Fire Department's areas of special training are: types of fires (chemical, electrical, paper); methods of fighting each type of fire; extinguishing agents (water, foam, dry chemical, etc.), locations of fire fighting equipment, and inspection, maintenance and use of equipment.

Response to Groundwater Contamination Incidents: Response to groundwater contamination including containment, withdrawal, monitoring, and notification requirements will be reviewed. The potential for groundwater contamination is minimal at the Plant 6 Warehouse - Building 79; KC-2 Warehouse, Bays #5, #6, and #7; Pilot Plant Warehouse - Building 68; and Plant 8 Warehouse - Building 80, because most hazardous waste on site is stored in containers inside these facilities. Groundwater contamination would be identified under the Groundwater Quality Assessment Program Plan (GQAPP).

Professionals responsible for implementing the facility RCRA Groundwater Monitoring Plan have access to ongoing professional development training to the extent needed to remain abreast of RCRA policy and technical issues relevant to their responsibilities.

Shutdown of Operations: There are no hazardous waste management processes (such as incineration) occurring that would require special training during shutdown. In the event of shutdown, inspections of the hazardous waste storage area would occur as required.

New employees and others eligible for the 24-hour core RCRA training course are also prepared to respond to basic medical emergencies. All successful course participants receive certification from the American Red Cross in First Aid and Cardiopulmonary Resuscitation (CPR).

H-2 Implementation of Training Program

Job-specific training is offered regularly as the need arises both for new and experienced employees. The site-wide one-hour RCRA Awareness Program mentioned at the beginning of this plan is presented at the FMPC annually for all personnel. All individuals involved in the handling or managing of hazardous wastes have attended the core 24-hour RCRA training program unless previous training or job experience exempted them from certain modules. All new employees and employees in new job positions involved in the handling of hazardous waste will receive the RCRA Awareness Program and the core RCRA training program within six months of their employment or new assignment at the FMPC. New employees and employees in new job positions involved in hazardous waste handling will work under supervision until they have fulfilled the RCRA training requirements.

Training at the FMPC is offered in a variety of formats. For example, sessions may be conducted in classroom meetings, in small discussion groups, in field exercises, emergency drills, and in on-the-job sessions. Training evaluation forms are used to monitor the success of the training modules. Trainee comments and constructive

criticism of the training programs are encouraged throughout the entire training program. These comments are used by the trainers to modify and improve the training program scope, content, and/or format, as appropriate.

Training effectiveness is measured by written examinations, a procedure designed in part to ensure compliance with OAC 3745-54-16 and 40 CFR, 264.16. The Manager of Training and Development must enter into the training record that an employee has successfully completed the necessary training. Employees who fail the written examinations will not be permitted to handle hazardous wastes. New employees and employees in new job positions involved in hazardous waste management will work under supervision until they have successfully completed this training, as evidenced by the passing of module-by-module tests and the issuance of a facility certificate.

The Training and Development Section documents implementation of training at the FMPC in its automated Training Records Management System (TRMS). The TRMS lists all employees' training records by individual, Department, and Section, and is managed in compliance with OAC 3745-54-16(D) and 40 CFR, 264.16(d). When individuals need to be retrained, the TRMS indicates needed retraining deadlines and the individuals who need to receive this retraining. An eight-hour refresher training course for all individuals involved in the handling or management of hazardous waste is scheduled using this automated training record management system.

The Training and Development Section also maintains all employee training files and documentation of training content. Employee training files include the employee's job description, completed training program tests, attendance rosters, and certifications, if applicable. Training records on current personnel will be kept on file at the facility until closure. Training files of former

employees will be kept for at least three years from the date the employee last worked at the facility.

SECTION H - PERSONNEL TRAINING

APPENDIX H-I

SITEWIDE RCRA AWARENESS ORIENTATION

SITEWIDE RCRA AWARENESS ORIENTATION

This Awareness Module addresses the following FMPC RCRA job tasks:

- Site knowledge
- Regulatory awareness
- Record keeping and reporting importance
- Hazardous waste minimization responsibility

The one-hour RCRA awareness program, presented to all FMPC employees, increases employees general understanding of RCRA and what the FMPC is doing in relation to RCRA, and increases consciousness regarding each person's responsibility in the minimization of hazardous waste.

To implement this program, the "Protecting and Environment: It's Everybody's Business" video is used as an overview of the basic elements of RCRA. The six key provisions of RCRA are then discussed in relation to the FMPC and the classification of wastes is introduced.

RCRA minimization is the primary focus of this presentation and is emphasized by presenting three main methods to minimize hazardous waste: use chemicals/materials that are biodegradable, keep wastes separated by not mixing RCRA and non-RCRA wastes, and remember that materials or chemicals are not considered a RCRA waste until there is no longer a use for it.

The awareness program is summarized by a video tape that presents an overview of RCRA activities at the FMPC and provides details of some innovative things being done to minimize hazardous waste.

SECTION H - PERSONNEL TRAINING
APPENDIX H-II

RCRA CORE TRAINING MODULES 1-9

MODULE 1 OF RCRA CORE TRAINING PROGRAM
HANDLING AND STORAGE OF HAZARDOUS WASTE

This Module addresses the following FMPC RCRA job tasks:

- Site knowledge
- Hazardous waste identification
- Regulatory awareness
- Hazardous waste activities
- Generator responsibilities
- RCRA storage area inspections
- Recordkeeping and reporting
- Contingency Plan

The four-hour module presents the major requirements governing the handling and storage of hazardous wastes. The session begins with a discussion on the background that led to the passage of the RCRA by Congress in 1976 and the major topics covered under this legislation.

This basic introduction is followed by an overview of the major components covered under Subtitle C Hazardous Waste. This introduction is reinforced through a video entitled "An Employee's Introduction to RCRA."

Specific requirements governing generators and treatment, storage, and disposal (TSD) facilities were presented. The emphasis is on the following topics:

- Waste identification and characterization, including the definitions of solid and hazardous wastes under RCRA and the methods for determining if wastes are hazardous. Examples of RCRA and non-RCRA wastes generated and handled on the site are presented.
- TSD facility permitting requirements, including the components of a Part B permit.

- Hazardous waste storage requirements in the designated storage areas and the Satellite Accumulation Areas at the FMPC. A map showing the location of the facility storage areas is distributed along with a list of the Satellite Accumulation Areas and a description of the wastes generated in each area.
- Inspection requirements for storage areas and Satellite Accumulation Areas are discussed, including timetables.
- The use of hazardous waste labels is discussed and examples of completed labels are distributed.
- The training requirements under RCRA are reviewed along with a discussion on the importance of training to a worker's health and safety and for environmental protection.
- The need for the preparation of an Emergency Prevention, Preparedness, and Contingency Plan is discussed, including the components of a PPC Plan.
- All recordkeeping and reporting requirements under RCRA are presented.
- Requirements for the transportation of hazardous waste are presented including the regulations under RCRA and the Department of Transportation. The purpose of the manifest is presented.
- The requirement for waste minimization is discussed. This discussion includes the rationale for waste minimization and examples of how waste minimization can be implemented.

This session concludes with an overview of environmental laws having an effect on the FMPC facility and some of the major requirements under each law.

MODULE 2 OF RCRA COMPLIANCE TRAINING
TRANSPORTATION OF HAZARDOUS MATERIALS

This Module addresses the following RCRA related tasks:

- Hazardous waste identification
- Regulatory awareness enhancement
- Site knowledge enhancement
- Waste transportation
- Manifest preparation
- Recordkeeping requirements
- Waste tracking

This four-hour module presents the manifest system at the FMPC, RCRA waste material packaging and markings, the warning label system, general RCRA and hazardous materials shipping requirements, and the regulations which mandate the proper transportation and handling of hazardous wastes and materials.

To introduce the transportation of hazardous materials topic, the general history of shipment regulations is discussed. The following topics are then presented:

- Methods for determining a RCRA waste material
- Use of the Hazardous Materials Table
- Identification number information and purpose of the identification number
- Manifest system
- Hazardous waste and materials packing and transportation requirements
- Marking requirements
- Placarding and labeling
- General shipping requirements.

Each of these topics consists of a verbal presentation and question and answer opportunities. A final written test covers the major presentation topics.

MODULE 3 OF THE RCRA CORE TRAINING PROGRAM
EMERGENCY PROCEDURES

This module addresses the following FMPC RCRA job tasks:

- Site knowledge
- Regulatory awareness
- Emergency response
- Personal protection
- Contingency Plan
- Hazardous waste activities

This four-hour module presents the areas in which emergency procedures are activated and the correct procedures to follow.

The first one-hour session, Emergency Response, begins with a video presentation of the Joint Response '89 and a discussion of the processes leading up to a successful Joint Response at the FMPC. Emergency response in the work place is heavily stressed by instructing the student in the proper response to alarms, location of rally points and alternate rally points, personal protection procedures, and the responsibilities of, and the facilities and equipment used by the FMPC Response Team personnel.

The second one-hour session, Fire & Explosions, discusses the following:

- Explanation of the Occupational Safety & Health Rights
- Classes of fire as they relate to the use of portable fire extinguishers
- Proper selection of the appropriate portable fire extinguisher for the various classes of fire
- The hazards of incipient stage fire fighting
- The appropriate action to take in case of fire and/or explosion

The third one-hour session, Regulatory Emergency Planning and Response at FMPC, and Response, Compressed Gas Safety & QS, discusses the following:

- Assume all spilled material at the FMPC is hazardous unless determined otherwise
- Take proper action when a RCRA or hazardous waste spill occurs
- Report spilled materials
- Determine wind direction by landmarks at FMPC
- Prevention and/or containment of spilled materials
- General principles of compressed gas cylinder safety

The last one-hour session is a talk-through scenario with discussion, question/answer sessions, and problem solving. The session is led and controlled by a facilitator to assure that only accurate information is disseminated.

MODULE 4 OF THE RCRA CORE TRAINING PROGRAM
LOT MARKING SYSTEM AT THE FMPC

This module addresses the following FMPC RCRA job tasks:

- Drum labeling
- Waste tracking
- RCRA storage inspections
- Site knowledge.

This one-hour module presents the lot marking system at the FMPC, particularly emphasizing RCRA. An informal lecture format is used and students are given an opportunity to become familiar with the FMPC lot marking system by using the FMPC Code Book.

The five elements of the lot marking system are discussed: production order ("R" = RCRA material); origin or source code; class or enrichment code; material description code, lot or sequence number. The elements are then related to RCRA material.

MODULE 5 OF THE RCRA CORE TRAINING PROGRAM
BASIC PRINCIPLES OF RESPIRATORY PROTECTION

This module is addresses the following FMPC RCRA job task:

- ° personal protection

This module includes a a two-hour informal lecture classroom presentation and a one-hour respirator fit test. Hands-on experience with the different types of respirators and the proper methods used to check each respirator type is emphasized.

To implement the classroom portion of this module, the following information is presented:

- ° Potential respiratory hazards in the workplace, i.e., particulates, gases and vapors, oxygen deficiencies, and combinations
- ° Potential interactions of hazards with workers, i.e., routes of entry, short term health effects, and delayed health affects.
- ° Methods to control potential workplace hazards (engineering control, administrative controls, and personal controls)
- ° Available types of respirator protection equipment
 - air-purifying
 - air-supply

The different types of respirators are shown to the class and each participant has an opportunity to examine them

- ° Equipment limitations and capabilities. The limitations of each type of respirator equipment is discussed and read by the class participants (dust mask, half-mask, full face, airlines, SCBA, ELSA, combination airline/SCBA).
- ° Inspecting, donning, and fitting respirators. Each class participant is given an opportunity to inspect the different types of respirators and donning procedures are reviewed.

The one-hour fit test is conducted in the health and safety lab on a one-to-one basis with class participants.

MODULE 6 OF THE RCRA CORE TRAINING PROGRAM
SELF CONTAINED BREATHING APPARATUS AND ACID SUITS

This module addresses the following FMPC RCRA job task:

- response protection.

This section assures that the attendees will be able to properly don and use Self Contained Breathing Apparatus (SCBA) and Acid Suits.

SCBA: The importance of this equipment is stressed along with the limitations and capabilities of the SCBA. The pre-donning steps necessary to ensure that the equipment is in proper condition are stressed. The limitations of the equipment include:

- Non-protection against excessive heat
- Non-protection against toxic materials that can be absorbed through the skin
- The supply of air limits the amount of time the equipment can be used
- Physical movement is restricted

The capabilities include:

- Protection against heated air
- Protection from inhalation of radioactive materials and asbestos
- Protection against oxygen deficiencies
- Protection against toxic materials that cannot be absorbed through the skin.

The differences between models are presented. The proper methods of donning the unit including check of face piece seal and operation of the

exhalation valve are demonstrated. Hands-on-training using the SCBA is included.

Use of Acid Suits: The use of acid suits is discussed including procedures to be followed at the incident site, pre-donning safety checks, and donning and working in an acid suit. The objective is to enable the student to learn how to properly utilize acid suits when responding to a Haz-Mat incident and to assure personal protection. The use of the "buddy system" is stressed with the understanding that two people enter, work, and leave a hot zone together. One person is never to be in a hot zone.

These tests are administered under both of these training sessions to ensure that the attendees understand the main points covered.

An employee must successfully complete the use of Self Contained Breathing Apparatus course before taking the Acid Suit course.

MODULE 7 OF THE RCRA CORE TRAINING PROGRAM
REGULATORY EMERGENCY PLANNING AND RESPONSE AT FMPC

This module addresses the following FMPC RCRA job tasks:

- Regulatory awareness
- Emergency response
- Contingency Plan
- Personal protection

This two-hour module provides detailed information regulatory emergency planning and response. It addresses the nature of spills, spill response, reporting and notification procedures and activities associated with maintaining the working environment in a safe and orderly manner are described.

Section 1 of the module focuses on the objectives and goal of the Regulatory Emergency Planning and Response Plan and includes:

- Definition of Regulatory Emergency Planning and Response
- Objectives of Regulatory Emergency Planning and Response

Section 2 addresses the nature of spills, incidents, and the possible causes of spills and includes:

- Types of spills
- Possible causes of spills

Section 3 provides discussion of the procedures involved in responding to a spill, reporting a spill, and notifying the AEDO of a spill. This section includes:

- Spill incident flow diagram
- Applicable documents
- Employee responsibilities

Section 4 contains descriptions of the actions to be taken in the work area to minimize the potential for spills. This section includes:

- Clean, orderly work environment
- Proper material storage
- Area inspections
- Preventative maintenance

MODULE 8 OF THE RCRA CORE TRAINING PROGRAM
EMERGENCY ACTION IN THE WORKPLACE AND EMERGENCY FIRST AID

This module addresses the following RCRA related tasks:

- Emergency response
- Personal protection

This module on First Aid and Emergency Action Principles was developed and presented by the American Red Cross in a five hour session. The following topics were presented:

- Introduction which included descriptions of what first aid is, urgent care responses, judgments in emergencies, and the eight topics to be followed in emergency action
- Rescue techniques to be applied in specific circumstances
- Checking for breathing and heartbeat
- Demonstration of the Airway Step
- Giving mouth-to-mouth breathing
- Checking circulation and breathing
- Controlling bleeding
- Responses to poisoning
- Preventing shock
- Examining the victim
- Looking for medical examination
- Emergency Services contact
- Continuing to check the victim.

Each of these topics consists of a verbal presentation, actual demonstrations, and questions and scenarios which allowed the participants to apply the techniques presented. During the CPR unit the participants must actually practice the life-saving techniques that have been demonstrated.

A final comprehensive test covers the main topics presented. This test must be successfully passed before a CPR Certification and Emergency First Aid Certification are granted.

MODULE 9 OF THE RCRA CORE TRAINING PROGRAM
TOXICOLOGY AND HAZARD RECOGNITION

This module addresses the following FMPC RCRA job tasks:

- Personal protection
- Drum labeling
- Hazardous waste identification

This two-hour module focuses on a basic understanding of how to recognize hazards in the workplace. The students are also provided an overview of FMPC protective equipment relevant to chemical hazards as well as to noise in the workplace. Formal and informal lecture formats are used and students are given an opportunity to become familiar with Material Safety Data Sheets which provide information on FMPC hazardous materials.

Different types of labeling at the FMPC are discussed including EPA and DOT requirements. The importance of toxicology to hazard recognition is discussed in terms of exposure, route of entry, personal factors, and toxic effects. Examples relevant to the FMPC are provided and explained in detail.