

ATTACHMENT 1-4 CHWSF TRAINING PLAN

1.0 PERSONNEL TRAINING: 40 CFR 264.16; R315-8-2.7

- 1.0.1 The Central Hazardous Waste Storage Facility (CHWSF) training plan has been developed to ensure that personnel involved with storage and management of hazardous wastes at CHWSF perform their duties according to accepted practices. Personnel identified in this plan must receive sufficient training to ensure that the facility is operated in a manner that will protect human health and the environment.
- 1.0.2 The training plan covers only hazardous waste management requirements. Other training requirements; such as those required by Dugway Proving Ground (DPG), the U.S. Army, the Occupational Safety and Health Administration (OSHA), or other agency; are not specifically included in this plan.

1.2 TRAINING OBJECTIVES: 40 CFR 264.16(a)(1); R315-8-2.7(a)(1)

- 1.2.1 The objective of all hazardous waste training is to provide the employee with the information needed to perform tasks in accordance with hazardous waste regulations. The hazardous waste training program for CHWSF is tailored to address employee duties and the types of wastes handled at that facility.
- 1.2.2 All personnel who are involved in handling or managing hazardous wastes at CHWSF receive training as specified in this training plan. All employees with responsibilities for CHWSF emergency response must be knowledgeable of the procedures detailed in the CHWSF Contingency Plan in Attachment 1-7 of this Permit.

1.3 TRAINING DIRECTOR: 40 CFR 264.16(a)(2); R315-8-2.7(a)(2)

- 1.3.1 The DPG Environmental Training Director shall ensure that each employee has completed all of the hazardous waste training for his or her specific job. As such, this person must be familiar with hazardous waste training requirements as well as the requirements of the CHWSF Permit including this Training Plan. The Training Director arranges for qualified instructors, schedules training, and ensures the quality of instruction. The Training Director ensures that all training is documented and that documentation is available for review.

1.4 EMERGENCY RESPONSE TRAINING: 40 CFR §264.16(a)(3); R315-8-2.7(a)(3)

- 1.4.1 Specified personnel are trained to respond properly to emergency situations as described in the CHWSF Contingency Plan (Attachment 1-7). All CHWSF personnel shall be familiar with the Contingency Plan, be able to identify emergency situations, and respond properly. Emergency response personnel should periodically rehearse implementation of the Contingency Plan.

2.0 TRAINING PROGRAM: 40 CFR 264.16(a)(1); R315-8-2.7(a)(1)

- 2.0.1 The CHWSF training program is designed to provide CHWSF personnel with sufficient training to perform their hazardous waste related job functions. CHWSF personnel responsibilities are outlined in Section 2.1. Specific training topics are described in Section 2.2.

2.1 PERSONNEL RESPONSIBILITIES: 40 CFR §264.16(d)(1) and (2); R315-8-2.7(d)(1) and (3)

2.1.1 Training objectives are based on an individual's job responsibilities. Job descriptions of key CHWSF personnel include:

- Site Manager: This individual is responsible for overall operations at CHWSF. Specific hazardous waste responsibilities include:
 - Supervise all tasks performed by Lead and Environmental Technicians;
 - Evaluate CHWSF operations to assure environmental protection in accordance with the Utah Administrative Code (UAC) Hazardous Waste Storage Facility permit and relevant regulations including, but not limited to, OSHA, U.S. Department of Transportation (DOT), and hazardous waste regulations;
 - Develop and implement an on-the-job training program for all CHWSF personnel;
 - Direct the development and implementation of a quality control plan, standing operating procedures (SOPs) and test and inspection procedures for CHWSF tasks;
 - Ensure complete and correct documentation of waste pickup, packaging, labeling, storage, and disposal activities;
 - Establish and monitor all aspects of employee safety program;
 - Conduct and document hazard communication training;
 - Review and approve reports and data summaries; and
 - Ensure CHWSF personnel are adequately trained for their job functions.
- Lead Technicians: These individuals report directly to the Site Manager. They oversee daily waste management activities. Their specific hazardous waste responsibilities include:
 - Schedule, coordinate, and directly supervise all tasks performed by Environmental Technicians;
 - Oversee daily operations of the CHWSF and schedule appropriate maintenance;
 - Oversee and/or perform daily and weekly CHWSF inspections;
 - Research, interpret, and ensure compliance with relevant laws, regulations, directives, policies, including but not limited to OSHA, DOT, UAC and the CHWSF Hazardous Waste Storage Facility permit;
 - Develop and maintain accurate records of CHWSF operations;
 - Use waste tracking system and facility operating record;
 - Oversee CHWSF sampling program;
 - Oversee and/or perform field hazard categorization of unknown wastes;
 - Review air monitoring data and provide ongoing input toward CHWSF air monitoring programs;
 - Oversee waste tracking to include review and approval/rejection of turn-in documentation;
 - Supervise all aspects of waste shipment procedures (i.e. profiles, manifests, land disposal requirements (LDR) notifications); and
 - Implement on-the-job training of Environmental Technicians.

- Environmental Technicians: These individuals report to a Lead Technician. Their specific hazardous waste responsibilities include:
 - Inspect the CHWSF and complete the inspection and inventory documentation;
 - Respond to leaks in containers in storage at the CHWSF including providing containment and control, cleaning up spills/leaks, and summoning assistance for control and cleanup of spills too large to be handled with the equipment on hand;
 - Sample wastes and complete chain-of-custody forms and field logs in accordance with approved methods and procedures;
 - Maintain an electronic database and hard copies of laboratory analytical reports;
 - Perform field hazard categorization of unknown wastes;
 - Perform air monitoring using a photo ionization detector during sampling and at the beginning of daily operations in the storage buildings;
 - Maintain the electronic CHWSF operating record files;
 - Interact with waste generators regarding storage of waste and preparing turn-in documentation for wastes;
 - Review waste turn-in documentation for approval/rejection;
 - Perform waste pickup, transportation, segregation, and storage;
 - Prepare waste shipments including review of analytical results, hazardous waste determination, labeling, over-packing/material handling, waste profiling, Defense Reutilization Management Office shipping documents, manifesting, and LDR notifications; and
 - Implement the CHWSF contingency plan.

2.2 TRAINING REQUIREMENTS

- 2.2.1 Training is provided for each individual such that they understand and perform their hazardous waste related responsibilities as outlined in Section 2.1. The Training Director must approve all training activities. All training shall be documented as described in Section 4.
- 2.2.2 CHWSF training may include one or more specific topics depending on the individual(s) being trained. Table 1 indicates the training requirements for each specific job function.

3.0 IMPLEMENTATION OF THE TRAINING PROGRAM: 40 CFR 264.16(b); R315-8-2.7(b) and (c)

- 3.0.1 Initial and continuing training for CHWSF personnel may be accomplished by a combination of classroom, computer-based, video-based instruction, skills demonstration, and on-the-job-training. Experienced peers or supervisors may provide on-the-job training if it is approved and documented by the Training Director.

3.1 INITIAL TRAINING: 40 CFR 264.16(b); R315-8-2.7(b)

- 3.1.1 CHWSF personnel shall fulfill the initial hazardous waste training requirements within 6 months of starting permit-related activities. Employees shall not work unsupervised until initial training is complete.

3.2 CONTINUING TRAINING: 40 CFR 264.16(c); R315-8-2.7(c)

- 3.2.1 Table 1 indicates which training components are to be provided on an annual basis. Required annual training will be received each calendar year. The Permittee may provide training in addition to that outlined in Table 1 to ensure that all personnel understand and comply with Permit requirements.

4.0 TRAINING DOCUMENTATION: 40 CFR 264.16(d) and (e); R315-8-2.7(d) and (e)

- 4.0.1 The Training Director maintains training documentation. Section 4.1 describes the training plan documentation requirements. Section 4.2 describes employee training documentation requirements.

4.1 TRAINING PLAN

- 4.1.1 The Dugway Environmental Program (DEP) Permit Coordinator maintains a current version of the CHWSF Training Plan. In addition, the CHWSF Site Manager maintains copies of the current plan.
- 4.1.2 Updates of this plan may occur as a result of changes involving regulations, waste type, operations, techniques, equipment, or the facility-specific emergency contingency plan procedures. Such changes may require modification of the permit pursuant to R315-4-1.5.

4.2 EMPLOYEE TRAINING RECORDS: 40 CFR 264.16(d) and (e); R315-8-2.7(d) and (e)

- 4.2.1 The Training Director maintains training records for CHWSF hazardous waste permit compliance. The CHWSF Site Manager shall also maintain copies of training records. Original training records for hazardous waste compliance shall include:
- Name of employee,
 - Job title,
 - Training and experience requirements,
 - Applicable pre-employment training and education records,
 - Required initial and continuing training , and
 - Record of completion of training and date of completion.

Table 1. CHWSF Hazardous Waste Management Training Requirements			
Training Requirement	Site Manager	Lead Technicians	Environmental Technicians
<u>RCRA Fundamentals</u> Overview of Regulations Waste characterization Data review	I&A	I&A	I&A
<u>CHWSF Site Specific</u> Waste sampling Container management Area inspections Inventory management Waste manifesting and shipment	I&A	I&A	I&A
<u>CHWSF Contingency Plan</u> <ul style="list-style-type: none"> • Emergency response • Contingency plans 	I&A	I&A	I&A
I&A = Initial and Annual training required			