

PART III UNIT-SPECIFIC CONDITIONS FOR FINAL STATUS OPERATIONS

OPERATING UNIT 11

Integrated Disposal Facility

Appendix 8A

Dangerous Waste Training Plan

5	1.0	PURPOSE AND SCOPE	Part III.11.8A.1
6			
7	2.0	RESPONSIBILITIES	Part III.11.8A.1
8	2.1	Management.....	Part III.11.8A.1
9	2.2	Training Manager.....	Part III.11.8A.1
10	2.3	Environmental Organization Responsibilities:	Part III.11.8A.2
11	2.4	Contracted Services (e.g., Fluor Federal Services (FFS) and Waste Management) .	Part III.11.8A.2
12	2.5	CH2M HILL Waste Services Responsibilities	Part III.11.8A.2
13			
14	3.0	PROCESS	Part III.11.8A.2
15	3.1	Training Program	Part III.11.8A.2
16	3.2	Emergency Response Training	Part III.11.8A.3
17	3.3	Dangerous Waste Worker Categories	Part III.11.8A.3
18	3.3.1	All Employees.....	Part III.11.8A.4
19	3.3.2	Waste Workers.....	Part III.11.8A.4
20	3.3.3	Advanced Waste Worker	Part III.11.8A.6
21	3.3.4	Waste Worker Supervisor/Manager.....	Part III.11.8A.6
22	3.4	Matrix of Training Requirements for Each Waste Worker Category	Part III.11.8A.6
23	3.4.1	All Employees.....	Part III.11.8A.7
24	3.4.2	Waste Worker	Part III.11.8A.7
25	3.4.3	Advanced Waste Worker	Part III.11.8A.7
26	3.4.4	Waste Worker Supervisor/Manager.....	Part III.11.8A.8
27	3.5	Job-Specific Facility Training.....	Part III.11.8A.8
28	3.6	Training Records.....	Part III.11.8A.9
29			
30	4.0	DEFINITIONS.....	Part III.11.8A.10
31			
32	5.0	SOURCES	Part III.11.8A.10
33	5.1	Requirements	Part III.11.8A.10
34	5.2	References.....	Part III.11.8A.10
35			

1
2
3
4
5
6

This page intentionally left blank.

USQ #03-2039-D

CH2M HILL Hanford Group, Inc.	Manual Document	Management Plan
DANGEROUS WASTE TRAINING PLAN	Page	IDF-PLN-07, REV A-2
	Issue Date	1 of 10
	Effective Date	May 14, 2003
		May 26, 2003

FUNCTIONAL AREA MANAGER: **P.C.Miller**

DOCUMENT OWNER: **S. A. Davis**

2
3 **1.0 PURPOSE AND SCOPE**
4

5 This document outlines the dangerous waste training plan (DWTP) developed for the Integrated
6 Disposal Facility (IDF) operated by the River Protection Project (RPP) Tank Farms Contractor
7

8 This plan applies to IDF personnel employed by the CH2M HILL Hanford Group, Inc., the
9 visitors CH2M HILL Hanford Group, Inc. brings onto the Hanford facility, and any
10 subcontractors conducting work on behalf of CH2M HILL Hanford Group, Inc. The Hanford
11 facility constitutes the Hanford site as defined by the Hanford facility Resource Conservation and
12 Recovery Act (RCRA) permit issued by Ecology.
13

14 **2.0 RESPONSIBILITIES**
15

16 **2.1 Management**
17

18 The waste management facility manager has overall responsibility for training at the IDF under
19 his control that includes but is not limited to: (5.1.1)
20

- 21 • Determine training requirements and training compliance for Hanford facility personnel,
22 subcontractors, and visitors who obtain access or work within the IDF unit.
23
- 24 • Identify training requirements to contractors working in or around IDF units.
25

26 **2.2 Training Manager**
27

- 28 • Ensure instructors have satisfactory instructional skills and are technically knowledgeable
29 through: current qualification/certification or specialized training, license/certificate or a
30 degree in the technical area, or other appropriate training or experience (see
31 DOE/RL-91-28 Chapter 8.0). (5.1.1)
32
- 33 • Conduct informal job analysis and identify training commensurate with personnel duties
34 and responsibilities.
35
- 36 • Design and develop training programs.
37
- 38 • Develop and instruct training courses.
39
- 40 • Develop and maintain On-The-Job training requirements.
41
- 42 • Maintain the RPP-IDF training records.

MANAGEMENT PLAN	Document	TFC-PLN-07, REV A-2
	Page	2 of 10
DANGEROUS WASTE TRAINING PLAN	Effective Date	May 26, 2003

1 **2.3 Environmental Organization Responsibilities:**
2

- 3 • Consult with training organization and IDF management in the development and
4 evaluation of current training programs.
5
6 • Assist IDF manager in determining training requirements and RCRA compliance for
7 personnel.
8
9 • Maintain current knowledge of RCRA training requirements pertaining to Hanford
10 facility personnel.
11

12 **2.4 Contracted Services (e.g., Fluor Federal Services (FFS) and Waste Management)**
13

14 Contracted personnel who are classified as Hanford facility personnel have the following
15 responsibilities:
16

- 17 • Ensure that employees are trained to meet RPP-IDF training requirements.
18 • Maintain employee training records and provide them if requested by RPP-IDF.
19

20 **2.5 CH2M HILL Waste Services Responsibilities**
21

- 22 • Provide daily Federal Register review, regulatory interpretation, and application of DOT
23 regulations. As new requirements are identified, this information is distributed to the
24 HAZMAT employees
25
26 • Maintain the authorized shippers list by reviewing shippers' qualifications through
27 training records and verifying receipt of "request for authority" forms signs by
28 requestor's management. This list is updated and distributed monthly
29
30 • Maintain a database, tracks shipping activities, and changes to the authorized shipper's
31 list
32
33 • Conduct DOT compliance verification inspection and verification on HAZMAT, HW,
34 RAM, and RMW shipments
35
36 • Provide information to training records regarding course completion.
37

38 **3.0 PROCESS**
39

40 **3.1 Training Program**
41

42 The introductory and continuing training programs are designed to prepare employees to operate
43 and maintain the tank farms in a safe, effective, efficient, and environmentally sound manner. In
44 addition to preparing employees to operate and maintain the tank farms under normal conditions,
45 the training program ensures that employees are prepared to respond in a prompt and effective
46 manner should abnormal or emergency conditions occur.
47

MANAGEMENT PLAN	Document Page	TFC-PLN-07, REV A-2
DANGEROUS WASTE TRAINING PLAN	Effective Date	3 of 10 May 26, 2003

1 Introductory training includes general Hanford facility training and TSD unit-specific training.

2
 3 General Hanford facility training is described in DOE/RL-91-28, Section 8.0, and provided in
 4 accordance with the Hanford Facility RCRA Permit (DW Portion), Condition II.C.

5
 6 TSD unit-specific training is provided to Hanford facility personnel, allowing personnel to work
 7 unescorted and, in some cases, is required for escorted access. Hanford facility personnel cannot
 8 perform a task for which they are not properly trained, except to gain required experience while
 9 under the direct supervision of a supervisor or coworker who is properly trained.

10
 11 The IDF Dangerous Waste training program is implemented. Incumbent personnel will complete
 12 new requirements within six months of the requirements being identified. Training of new
 13 employees is completed within the first six months of assignment. Training for personnel
 14 assigned to new positions is completed within six months of reassignment. Personnel who have
 15 not completed training are permitted to work at the IDF only under the supervision of a trained
 16 employee. IDF operations management is responsible for ensuring that personnel are trained and
 17 required qualifications are maintained. (5.1.3)

18
 19 Continuing training meets the requirements for WAC 173-303-330(1)(b) and includes general
 20 Hanford facility training and TSD unit-specific training. (5.1.2)

21
 22 **3.2 Emergency Response Training**

23
 24 Federal and state regulations require that personnel be able to respond effectively to emergencies.
 25 In accordance with WAC 173-303-330(1)(d), personnel are trained on aspects applicable to
 26 operations. The following table indicates requirements from WAC 173-303-330(1)(d) applicable
 27 to IDF operations. (5.1.1, 5.1.4)

Elements of WAC 173-303-330(1)(d)	Applicability to TSD Units (1) and < 90-day Accumulation Areas (2)	
	(1)	(2)
Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment	YES	YES
Key parameters for automatic waste feed cut-off systems	YES	NO
Communications or alarm systems	YES	YES
Response to fires or explosions	YES	YES
Response to groundwater contamination incidents	YES	YES
Shutdown of operations	YES	YES

29
 30 **3.3 Dangerous Waste Worker Categories**

31
 32 Employee duties at the IDF are categorized within four worker categories. In the event personnel
 33 duties and responsibilities overlap between categories, the employee will complete the training
 34 requirements for each category. These categories are: (5.1.1, 5.1.5)

- 35
 36 1. All Employees

MANAGEMENT PLAN	Document	TFC-PLN-07, REV A-2
	Page	4 of 10
DANGEROUS WASTE TRAINING PLAN	Effective Date	May 26, 2003

- 2. Waste Worker
- 3. Advanced Waste Worker
- 4. Waste Worker Supervisor/Manager

Each employee is assigned a job title (from salaried nonexempt or bargaining unit classifications) or position (from exempt classifications). Job or position descriptions include requisite skills, work experience, education and other qualifications, and a list of duties and/or responsibilities for each job title or position. The work experience, education, and other qualifications required for each position are maintained by IDF Human Resources. As a minimum, "all employees" require a high school diploma or equivalent. Personnel filling exempt, management, or engineering positions normally require a college degree with two or more years of industry experience. (5.1.5)

Only names of Hanford facility personnel who carry out job duties relating to TSD unit waste management operations at IDF are maintained. Names are maintained in electronic data storage within the Integrated Training Electronic Matrix (ITEM). A list of Hanford facility personnel assigned to IDF is available upon request.

In the following sections, brief job titles and position descriptions of employees associated with dangerous waste management at IDF are listed within the appropriate waste worker category. (5.1.5)

3.3.1 All Employees

Hanford facility personnel included in this position are not categorized into one of the other three worker positions. Non-Hanford facility personnel included within this position are those personnel that require access to portions of the Hanford facility not accessible to the public.

Personnel in the "all employees" position are prohibited from performing duties or responsibilities associated with the management of waste in accumulation/storage containers on the Hanford facility. These personnel have the responsibility to report spills and releases that they discover in addition to taking any evacuation or take cover actions in response to specific incidents that may occur.

Most of the Hanford facility personnel categorized as "all employees" will be administrative and technical/professional personnel which include secretaries, clerks, and support organizations who perform walk-downs or provide oversight. Most non-Hanford facility personnel will be categorized as "all employees" since these personnel generally tour, provide oversight, or are brought on the Hanford facility for interviews. Other non-Hanford facility personnel who gain access to the Hanford facility to complete work in controlled areas that will not directly involve the management of dangerous or mixed waste, will be categorized as "all employees."

All employees are required to complete Hanford General Employee Training (HGET) with an annual refresher (HGET core).

3.3.2 Waste Workers

Hanford facility personnel or non-Hanford facility personnel with waste management duties and responsibilities who require unescorted access and are limited to the initial generation of

MANAGEMENT PLAN

**Document
Page**

**TFC-PLN-07, REV A-2
5 of 10**

**DANGEROUS WASTE TRAINING
PLAN**

Effective Date

May 26, 2003

1 dangerous or mixed waste and placing that waste into a pre-approved container, or who conduct
2 dangerous or mixed waste inspections, are categorized as waste workers.

3
4 The pre-approved container can include those in a satellite accumulation area, <90-day
5 accumulation area, or temporary storage and disposal unit.

6
7 These personnel could generate dangerous or mixed waste while working on a non-RCRA system
8 (e.g., building maintenance) or working on a temporary storage and disposal unit when
9 conducting maintenance. These personnel could also include operators who conduct daily
10 inspections on tank systems to ensure they are operating properly, and operators who conduct
11 daily inspections on ancillary equipment.

12
13 The work may be unsupervised or completed under the supervision of qualified unit/building
14 personnel (e.g., the person in charge or field work supervisor). In addition, a waste worker must
15 fulfill the roles of an "all employee." Hanford facility personnel categorized as waste workers
16 may be assigned duties and responsibilities for:

- 17 • Placing waste they generate into pre-approved containers and filling out log sheets, where
18 applicable
- 19 • Completing radiological surveys of dangerous or mixed waste
- 20 • Loading packaged containers onto trucks or movement of containers
- 21 • Responding to a spill or release of known contents where the duties and responsibilities
22 are limited to containing the spill/release, returning the drum to an upright position, and
23 placing the known spilled material or waste into a pre-approved container
- 24 • Applying container markings or labels based on direction received from others
- 25 • Responding to regulatory agency compliance inspectors' questions about waste
26 management practices
- 27 • Performing an inventory of dangerous or mixed waste
- 28 • Conducting inspections of dangerous or mixed waste.

29
30
31
32
33
34
35
36
37
38 Personnel who function as waste workers may include, but are not limited to, the following:

- 39 • Maintenance and craft personnel
- 40 • Operators
- 41 • Health physics technicians
- 42 • Transporters
- 43 • Contractor crafts
- 44 • Technical support staff.

45
46
47 The list of employees currently filling this position is maintained by the ITEM.

MANAGEMENT PLAN	Document	TFC-PLN-07, REV A-2
	Page	6 of 10
DANGEROUS WASTE TRAINING PLAN	Effective Date	May 26, 2003

1
2 **3.3.3 Advanced Waste Worker**
3

4 Hanford facility personnel are categorized as advanced waste workers if their duties and
5 responsibilities concerning dangerous or mixed waste exceed that of waste workers (therefore, an
6 advanced waste worker may fulfill the roles of a waste worker.) Examples of these duties and
7 responsibilities can include determining container markings, sampling of waste, designation of
8 waste material(s), and classification of waste materials prior to shipment.
9

10 The list of employees currently filling this position is maintained by the ITEM.
11

12 **3.3.4 Waste Worker Supervisor/Manager**
13

14 Various types of managers and non-managers are included in this position. Hanford facility
15 personnel assigned to unit/buildings can be categorized as waste worker supervisor/managers if
16 they direct waste worker or advanced waste worker activities relating to dangerous waste
17 management and compliance activities. Managers and non-managers who direct waste workers
18 and advanced waste workers have many similar duties and responsibilities relating to dangerous
19 or mixed waste management and are required to take the same courses.
20

21 The following staff has duties and responsibilities that meet this description:
22

- 23 • Emergency coordinator and/or alternate(s) (e.g., building emergency directors and some
24 building wardens)
- 25
- 26 • Environmental Compliance Officer and Waste Management manager for IDF
27
- 28 • Immediate managers of waste workers and advanced waste workers (e.g., field work
29 supervisors, Radiological Control first-line managers and operations
30 engineers/managers).
31

32 The list of employees currently filling this position is maintained by the ITEM.
33

34 **3.4 Matrix of Training Requirements for Each Waste Worker Category**
35

36 The following training requirements are maintained in the ITEM. Based on training assessments,
37 oversight, and acting within federal and state regulations, IDF management may change the
38 training requirements. For this reason, a current course listing is available upon request.
39

40 Course descriptions with retrain frequencies are linked to the courses in the ITEM. Continuing
41 training (retraining) courses are linked in the ITEM database to the initial training course. If the
42 continuing training is not kept current, the system will show the initial course as delinquent. (5.1.5)
43

MANAGEMENT PLAN	Document	TFC-PLN-07, REV A-2
	Page	7 of 10
DANGEROUS WASTE TRAINING PLAN	Effective Date	May 26, 2003

1 **3.4.1 All Employees**

2
3 NOTE: Select [link](#) for course description (5.1.5)

4 [000001](#)

HANFORD GENERAL EMPLOYEE TRAINING - FULL

5
6 **3.4.2 Waste Worker**

7 [] Option 01 Waste Worker Core, Individual performs duties as a Waste Worker at the River Protection Project Tank Farms Contractor.

[000001](#) HANFORD GENERAL EMPLOYEE TRAINING - FULL
[03E060](#) RPP/TANK FARM FACILITY EMERGENCY HAZARDS CHECKLIST
[350560](#) RPP WASTE HANDLING, SEGREGATION AND PACKAGING
XXXXXX Integrated Diposal Facility Orientation

[] Option 02 The course covers federal, state and company policy regarding the management of containerized waste, both regulated (dangerous) and non-regulated.

[035100](#) CONTAINER WASTE MANAGEMENT INITIAL

8
9 **3.4.3 Advanced Waste Worker**

10 [] Option 01 Advanced Waste Worker Core, Individual performs duties as an Advanced Waste Worker at the RPP Tank Farms Contractor.

[000001](#) HANFORD GENERAL EMPLOYEE TRAINING - FULL
[035100](#) CONTAINER WASTE MANAGEMENT INITIAL
[03E060](#) RPP/TANK FARM FACILITY EMERGENCY HAZARDS CHECKLIST
[350560](#) RPP WASTE HANDLING, SEGREGATION AND PACKAGING
XXXXXXX Integrated Diposal Facility Orientation

[] Option 02 Waste Designator, Individual performs Waste Designation duties at the RPP Tank Farms Contractor

[035010](#) WASTE DESIGNATION
[035012](#) WASTE DESIGNATION QUALIFICATION
[035020](#) FACILITY SAMPLING AND ANALYSIS

[] Option 03 Hazardous Waste Shipper, Individual performs Hazardous Waste Shipping duties at the RPP Tank Farms Contractor. Note: Need to select Option 04 "Radioactive Materials Shipper" if Individual will be performing duties as a "Mixed Waste Shipper".

[020159](#) ADVANCED COURSE 2 - HAZARDOUS WASTE SHIPPER CERTIFICATION TRAINING

[] Option 04 Radioactive Materials Shipper, Individual performs Radioactive Material Shipping duties at

MANAGEMENT PLAN	Document	TFC-PLN-07, REV A-2
	Page	8 of 10
DANGEROUS WASTE TRAINING PLAN	Effective Date	May 26, 2003

the RPP Tank Farms Contractor. Note: Need to select Option 03 "Hazardous Waste Shipper" if Individual will be performing duties as a "Mixed Waste Shipper".

[020069](#) ADVANCED COURSE 3 - RADIOACTIVE MATERIALS SHIPPER CERTIFICATION TRAINING

1
2
3

3.4.4 Waste Worker Supervisor/Manager

[] Option 01 Waste Worker Supervisor/Manager Core, Individuals that direct Waste Worker or Advanced Waste Worker activities relating to dangerous or mixed waste management and compliance activities.

[000001](#) HANFORD GENERAL EMPLOYEE TRAINING - FULL

[035050](#) ENVIRONMENTAL REGULATIONS AT HANFORD (CLASSROOM)

[03E060](#) RPP/TANK FARM FACILITY EMERGENCY HAZARDS CHECKLIST

[350560](#) RPP WASTE HANDLING, SEGREGATION AND PACKAGING

XXXXXX Integrated Diposal Facility Orientation

[] Option 02 Waste Shipper/Supervisor, Individual performs Waste Shipping / Supervision duties at the RPP Tank Farms Contractor

[020078](#) ADVANCED COURSE 4 - MIXED WASTE SHIPPER CERTIFICATION TRAINING

[020159](#) ADVANCED COURSE 2 - HAZARDOUS WASTE SHIPPER CERTIFICATION TRAINING

[035100](#) CONTAINER WASTE MANAGEMENT INITIAL

[] Option 03 Waste Designator/Supervisor, Individual performs Waste Designation / Supervision duties at the RPP Tank Farms Contractor

[035010](#) WASTE DESIGNATION

[035012](#) WASTE DESIGNATION QUALIFICATION

[035020](#) FACILITY SAMPLING AND ANALYSIS

4
5
6
7

3.5 Job-Specific Facility Training

8 The IDF-specific and job-specific qualifications and/or certifications are maintained according to
9 contractual and regulatory requirements. IDF management uses qualification lists to ensure
10 personnel they assign to work in the tank farms meet current training requirements. The
11 qualification lists, generated using the PeopleSoft® database, are updated on a daily basis and are
12 posted to the [IDF Training Web Page](#).
13

MANAGEMENT PLAN

Document

TFC-PLN-07, REV A-2

Page

9 of 10

**DANGEROUS WASTE TRAINING
PLAN**

Effective Date

May 26, 2003



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

3.6 Training Records

Training records, as described in WAC 173-303-330, consist of documentation that show training has been completed. Training records associated with personnel identified in the DWTP are maintained in accordance with DOE/RL-91-28 Chapter 8.0. Hanford Facility training records include both electronic data storage and hard copies. Course completion documentation for personnel is maintained in both hard copy and electronic formats. (5.1.5)

The course completion documentation will contain the course number, course title, and date of completion. Copies of the training record files for IDF Dangerous Waste management employees are stored at IDF Training. The originals are sent to Fluor Hanford, Inc. (FH) Training and are initially maintained in Richland, Washington. Original hard copy training records are transferred periodically to the Records Holding Facility in Richland, Washington. After approximately one year, the original hard copy training records are archived at the permanent record storage center in Renton, Washington. Course completion documentation of former employees are maintained in accordance with DOE/RL-91-28 Chapter 8.0 and Hanford Facility RCRA Permit, General Facility Condition II.I.1, Regarding Facility Operations Record.

When a training record is requested during an inspection, an electronic data storage record will initially be provided. If the electronic data storage record does not satisfy the inspection concern, a hard copy training record will be provided. Training records of former employees may not be available through computers at IDF and may require a representative from FH Training to access the PeopleSoft® system for this information.

MANAGEMENT PLAN	Document	TFC-PLN-07, REV A-2
	Page	10 of 10
DANGEROUS WASTE TRAINING PLAN	Effective Date	May 26, 2003

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46

4.0 DEFINITIONS

No terms or phrases unique to this procedure are used.

5.0 SOURCES

5.1 Requirements

1. WAC 173-303-330 "Dangerous Waste Regulations," Section 330(1) and (1)(a), Personnel Training. (S/RID)
2. WAC 173-303-330 "Dangerous Waste Regulations," Section 330(1)(b). (S/RID)
3. WAC 173-303-330 "Dangerous Waste Regulations," Section 330(1)(c). (S/RID)
4. WAC 173-303-330 "Dangerous Waste Regulations," Section 330(1)(d). (S/RID)
5. WAC 173-303-330 "Dangerous Waste Regulations," Section 330(2). (S/RID)

5.2 References

1. 40CFR265.16, "Protection of Environment, Interim Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities," Personnel Training.
2. DOE/RL-91-28 Rev 4, "Dangerous Waste Portion Of The Resource Conservation and Recovery Act Permit for the Treatment, Storage, and Disposal of Dangerous Waste," Chapter 8, Personnel Training.