

WASTE TREATMENT AND IMMOBILIZATION PLANT
CHAPTER 8.0
PERSONNEL TRAINING
CHANGE CONTROL LOG

Change Control Logs ensure that changes to this unit are performed in a methodical, controlled, coordinated, and transparent manner. Each unit addendum will have its own change control log with a modification history table. The “**Modification Number**” represents Ecology’s method for tracking the different versions of the permit. This log will serve as an up to date record of modifications and version history of the unit.

Modification History Table

Modification Date	Modification Number
06/2011	

This page intentionally left blank.

1
2
3
4
5

CHAPTER 8.0
PERSONNEL TRAINING

1
2
3
4
5
6

This page intentionally left blank.

CHAPTER 8.0
PERSONNEL TRAINING

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18

TABLE OF CONTENTS

8.0	Introduction	5
8.1	Initial Training.....	5
8.2	Task Specific Training	6
8.3	Description of Training Plan	7
8.4	Continuing Training	8
8.5	Training Program Administration	9
8.6	Job Title and Job Description.....	9
8.7	Documentation and Record Retention.....	9

TABLES

Table 8-1	Example WTP Training Matrix.....	10
-----------	----------------------------------	----

1
2
3
4
5

This page intentionally left blank.

1 **8.0 PERSONNEL TRAINING**INTRODUCTION

2 This chapter discusses personnel training requirements based on Washington Administrative Code
3 [\(WAC\) 173-303](#) and the *Dangerous Waste Portion of the Hanford Facility Resource Conservation and*
4 *Recovery Act Permit for the Treatment, Storage, and Disposal of Dangerous Waste* (Ecology 1994a),
5 hereafter referred to as “the Permit”.

6 Permit Condition II.C (Personnel Training) contains training requirements applicable to Hanford ~~Facility~~
7 ~~personnel and non-Site~~ facility personnel and non-facility personnel. Compliance with these
8 requirements at the Hanford Tank Waste Treatment and Immobilization Plant (WTP) is demonstrated by
9 information contained in both *Permit Attachment 5* and this chapter. A ~~WTP Dangerous Waste Training~~
10 ~~Plan~~ training plan for the WTP will be submitted for incorporation into the Administrative
11 Record operating record prior to initial receipt of waste to meet Compliance Schedule Item interim
12 compliance schedule item 7.

13 ~~This chapter will be updated and resubmitted for agency approval prior to initial receipt of waste, in~~
14 ~~accordance with Compliance Schedule Item 6.~~

15 ~~Outline of Introductory and Continuing Training Programs~~

16 ~~The introductory and continuing training programs are designed to prepare personnel during the~~
17 ~~operations phase, to manage and maintain the WTP in a safe, effective, and environmentally sound~~
18 ~~manner. In addition to preparing personnel to manage and maintain the WTP under normal conditions,~~
19 ~~the training programs ensure that personnel are prepared to respond in a prompt and effective manner~~
20 ~~should off normal or emergency conditions occur. Emergency response training is consistent with the~~
21 ~~description of actions contained in Part III, Operating Unit Group 10, Chapter 7.0, Contingency Plan.~~
22 ~~The introductory and continuing training programs are intended to meet the following objectives:~~

23 ~~Teach WTP personnel to perform their duties in a way that ensures the WTP’s compliance with~~
24 ~~WAC 173-303 and this Permit.~~

25 ~~Teach WTP personnel dangerous waste management procedures (including implementation of the~~
26 ~~contingency plan) relevant to the job titles and positions in which they are employed.~~

27 ~~Ensure that WTP personnel can respond effectively to emergencies.~~

28 **8.1 INTRODUCTORY**INITIAL TRAINING

29 Introductory training includes general Hanford Facility training and WTP-specific training. General
30 Hanford Facility training is described in Permit Attachment 5, and provided in accordance with, Permit
31 Condition II.C. WTP-specific training is provided to WTP personnel allowing personnel to work
32 unescorted, and in some cases is required for escorted access. WTP personnel cannot perform a task for
33 which they are not properly trained, except to gain required experience while under the direct supervision
34 of a supervisor or coworker who is properly trained. WTP personnel will be trained within six-6 months
35 after their employment at or on assignment to the WTP. If personnel are assigned to a new job title or
36 position at the WTP, any additional position-specific training will be completed within six-6 months.

37 **General Hanford Facility Orientation:** Refer to description in Permit Attachment 5, Section 5.1.

38 **Contingency Plan Training:** WTP personnel receive training on applicable portions of the *Hanford*
39 *Emergency Management Plan*, (DOE/RL-94-02), as amended (Permit Attachment 4) in General Hanford
40 Facility Orientation. In addition, WTP personnel receive training on the description of actions contained
41 in the ~~C~~contingency ~~P~~plan documentation in Part III, Operating Unit Group 10, Chapter 7.0 ~~and~~
42 ~~Appendix 7A~~, to be able to effectively respond to WTP emergencies ~~at the WTP~~.

43 **Emergency Coordinator Training:** WTP personnel who perform emergency coordinator duties as
44 specified in [WAC 173-303-360](#) (~~for example, e.g.,~~ the Building Emergency Director) in the Hanford
45 Incident Command System (ICS) receive training on implementation of the ~~C~~contingency ~~P~~plan and

1 fulfilling the position within the Hanford ~~Incident Command System~~ICS. These WTP personnel will also
2 become thoroughly familiar with applicable ~~C~~contingency ~~P~~plan documentation, operations, activities,
3 location, and properties of waste handled, location of records, and the unit and building layout.

4 **Operations Training:** Dangerous waste management operations training (~~for example, e.g.,~~ waste
5 designation training, shippers training) will be determined on a unit-by-unit basis, and will consider the
6 type of waste management unit and the type of activities performed at the waste management unit. For
7 example, training provided for management of dangerous waste in containers will be different than the
8 training provided for management of dangerous waste in a tank system. Common training required for
9 compliance within similar waste management units can be provided in general training, and supplemented
10 at the WTP. Training provided for WTP-specific operations ~~will be~~ identified in both this chapter and
11 ~~will be included in~~ the WTP Dangerous Waste Training Plan. The detailed course curricula descriptions
12 will be contained in the WTP Dangerous Waste Training Plan. WTP-specific training ~~will be~~ based on
13 ~~the following:~~

- 14 • Whether a general training course exists.
- 15 • The training needs to ensure waste management unit compliance with [WAC 173-303](#).
- 16 • Training commitments agreed to with the Washington State Department of Ecology.

17 **8.2 CONTINUING-TASK SPECIFIC TRAINING**

18 ~~Continuing training meets the requirements for [WAC 173-303-330\(1\)\(b\)](#) and includes general facility~~
19 ~~training and unit specific training, as specified below.~~

20 ~~**General Hanford Facility Orientation:** Annual refresher training is provided for General Hanford~~
21 ~~Facility training. Refer to description in Permit Attachment 5, Section 5.1.~~

22 ~~**Contingency Plan Training:** Annual refresher training is provided for contingency plan training. Refer~~
23 ~~to description above in Section 8.1.1.~~

24 ~~**Emergency Coordinator Training:** Annual refresher training is provided for emergency coordinator~~
25 ~~training. Refer to description above in Section 8.1.1.~~

26 ~~**Operations Training:** Refresher training occurs on various frequencies for operations training (that is,~~
27 ~~annual, every other year, every three years). When justified, some training will not contain a refresher~~
28 ~~course and will be identified as a one-time-only training course. The WTP Dangerous Waste Training~~
29 ~~Plan and the training matrix in [Table 8-1](#) of this chapter will specify the frequency for each training~~
30 ~~course. Refer to description above in Section 8.1.1.~~

31 **8.2.1 Description of Training Design**

32 A properly designed training program ensures that personnel who perform duties at the WTP related to
33 [WAC 173-303-330\(1\)\(d\)](#) are trained to perform their duties in compliance with [WAC 173-303](#). Actual
34 job tasks, referred to as duties, are used to determine training requirements.

- 35 • The first step taken to ensure that WTP personnel have received the proper training is to
36 determine and document the waste management duties by job title/ ~~and~~ position.
- 37 • In the second step, waste management duties are compared to the general waste management unit
38 training curriculum. If the general waste management unit training curriculum does not address
39 the waste management duties, the training curriculum is supplemented and/ ~~(or)~~ on-the-job
40 training is provided.
- 41 • The third step summarizes the content of a training course necessary to ensure ~~that~~ the training
42 addresses the appropriate waste management duties.
- 43 • The fourth and last step is to assign training curriculum to WTP personnel based on their job title/
44 ~~and~~ position. The WTP Dangerous Waste Training Plan ~~will~~ describes this process.

1 Waste management duties include those specified in ~~Section~~[Attachment 5 and Table 8.1](#), as well as those
2 contained in [WAC 173-303-330\(1\)\(d\)](#). Training elements of [WAC 173-303-330\(1\)\(d\)](#) applicable to WTP
3 operations include the following:

- 4 • Procedures for using, inspecting, repairing, and replacing emergency equipment and monitoring
5 equipment.
- 6 • Key parameters for automatic waste feed cut-off systems.
- 7 • Communications or alarm systems.
- 8 • Response to fires or explosions.
- 9 • ~~Response to groundwater contamination incident.~~
- 10 • Shutdown of operations.

11 WTP personnel who perform these duties receive training specific to their duties. The WTP Dangerous
12 Waste Training Plan ~~described in Section 8.3~~ will contain detailed course curricula for the types of
13 training WTP personnel receive based on ~~the outline in Section 8.~~[Attachment 5 and Table 8-1](#).

14 **8.3 DESCRIPTION OF TRAINING PLAN**

15 The WTP Dangerous Waste Training Plan will consist of one or more documents and a training database.
16 As allowed under Permit Condition II.C.5.b, training records will be maintained in hard copy and/or
17 electronic media.

18 In accordance with Permit Condition II.C.5.b, the WTP Dangerous Waste Training Plan is maintained
19 outside the Permit, in the WTP Unit-Specific Files of the Hanford Facility Operating Record. Changes to
20 the WTP Dangerous Waste Training Plan are not required to undergo a permit modification. However,
21 any change to this chapter is required to undergo a permit modification, which may affect information
22 contained in the training plan. Upon completion of a permit modification that updates this chapter, the
23 permittee has 6 months to submit an updated WTP Dangerous Waste Training Plan for incorporation into
24 the Operating Record.

25 In accordance with Permit Condition II.C.1, the unit-specific portion of the Permit will contain a
26 description of the training plan.

27 A description of how The WTP Dangerous Waste Training Plan meets the requirements in
28 [WAC 173-303-330\(2\)](#) is as follows:

- 29 1. [-330\(2\)\(a\)](#): “The job title, job description, and name of the employee filling each job. The job
30 description will include requisite skills, education, other qualifications, and duties for each
31 position.”

32 **Description:** The specific WTP personnel job title and position is correlated to the waste
33 management duties. Waste management duties relating to [WAC 173-303](#) are correlated to
34 training courses to ensure training is properly assigned.

35 Only names of WTP personnel who perform duties relating to waste management operations at
36 the WTP are required to be maintained. Names are maintained as described in the WTP
37 Dangerous Waste Training Plan. A list of personnel assigned to the WTP is available upon
38 request.

39 Information on requisite skills, education, and other qualifications for job title and positions are
40 addressed by providing a reference where this information is maintained (for example, Human
41 Resources). Specific information concerning job title, requisite skills, education, and other
42 qualifications for personnel can be provided upon request.

- 1 2. [-330\(2\)\(b\)](#): “A written description of the type and amount of both introductory and continuing
2 training required for each position.”

3 **Description:** In addition to the outline provided in Section 8.0, training courses developed to
4 comply with the introductory and continuing training programs are identified and described in the
5 WTP Dangerous Waste Training Plan. As discussed above in Section 8.1, the training plan will
6 be updated to include detailed course curricula for the types of training WTP personnel receive
7 based on the outline in Section 8.0. The type and amount of training is specified in the training
8 plan. [Table 8-1](#) is included as an example of a typical training matrix that shows typical job/titles
9 and positions matched to a training category. The WTP Training Plan will be developed and
10 submitted in accordance with Permit Condition III.10.C.7, and will include dangerous waste
11 management related job titles and position descriptions, and the type and amount of initial,
12 refresher, and on-the-job training required for each.

- 13 3. [-330\(2\)\(c\)](#) and [330\(3\)](#): “Records documenting that personnel have received and completed the
14 training required by this section. The Department may require, on a case-by-case basis, that
15 training records include employee initials or signature to verify that training was received.”

16 **Description:** Training records are maintained consistent with Permit Attachment 5, Section [8.5.5](#)
17 and [WAC 173-303-330\(3\)](#).

18 **8.4 CONTINUING TRAINING**

19 Initial and continuing training programs are also designed to prepare personnel during the operations
20 phase, and to manage and maintain the WTP in a safe, effective, and environmentally sound manner. In
21 addition to preparing personnel to manage and maintain the WTP under normal conditions, the training
22 programs ensure that personnel are prepared to respond in a prompt and effective manner should off
23 normal or emergency conditions occur. Emergency response training is consistent with the description of
24 actions contained in Part III, Operating Unit Group 10, Chapter 7.0, Contingency Plan. The introductory
25 and continuing training programs are intended to meet the following objectives:

- 26 • Teach WTP personnel to perform their duties in a way that ensures the WTP’s compliance with
27 WAC 173-303 and this permit
28 • Teach WTP personnel dangerous waste management procedures (including implementation of the
29 contingency plan) relevant to the job titles and positions in which they are employed
30 • Ensure that WTP personnel can respond effectively to emergencies
31 • Ensure that the WTP training program is reviewed annually to meet the requirements in WAC
32 WAC 173-303-330 (1) (b).

33 Continuing training meets the requirements for WAC 173-303-330(1)(b) and includes general facility
34 training and unit specific training, as specified below.

35 **General Hanford Facility Orientation:** Annual refresher training is provided for general Hanford
36 Facility training. Refer to description in Permit Attachment 5, Section 5.1.

37 **Contingency Plan Training:** Annual refresher training is provided for contingency plan training. Refer
38 to description above in Section 8.1.

39 **Emergency Coordinator Training:** Annual refresher training is provided for emergency coordinator
40 training. Refer to description above in Section 8.1.

41 **Operations Training:** Refresher training occurs on various frequencies for operations training (i.e.,
42 annual, every other year, every 3 years). When justified, some training will not contain a refresher course
43 and will be identified as a one-time-only training course.

1 **8.5 TRAINING PROGRAM ADMINISTRATION**

2 The WTP Project Training Department is responsible for identifying the appropriate training requirements
3 specified in Attachment 5 and [Table 8-1](#) to ensure that personnel are trained, qualified, and capable of
4 performing their assigned tasks. Project Training is also responsible for providing the support necessary
5 to ensure that personnel are qualified to safely and effectively meet job requirements.

6 **8.6 JOB TITLE AND JOB DESCRIPTION**

7 The job titles and job positions are specified in Attachment 5 and categorized in [Table 8-1](#).

8 **8.7 DOCUMENTATION AND RECORD RETENTION**

9 All personnel training records at the WTP facility will be recorded and maintained in the WTP Unit
10 operating record, (Hanford Facility Operating Record), and will be kept onsite or at the permittee's
11 offices located in Richland, Washington, per recordkeeping requirements in Permit Condition II.I and
12 [WAC 173-303-380](#).

13

Table 8-1 Example WTP Training Matrix

Training Category ^a								
Permit Attachment 5 Training Category	General Hanford Facility Training	Contingency Plan Training	Emergency Coordinator Training	Operations Training				
WTP DWTP Implementing Category	Orientation Program	Emergency Management Plan	Emergency Coordinator Training	General Waste Mgmt	Container Mgmt	Tank System Mgmt	Containment Buildings Mgmt	Misc Unit Mgmt
Example Job Title/Position								
Operators	X	X		X		X	X	X
Shift Operations Manager	X	X	X	X	X	X	X	X
Hazardous Waste Operations (HWO) Manager	X	X		X	X	X	X	X
Operations Manager	X	X	X	X				
Environmental Compliance Officer	X			X				
Waste Service Provider	X			X	X			
Hazardous Waste Operators	X	X		X	X	X	X	X
Laboratory Technician –Hazardous Waste Operations (HWO)	X	X		X	X			
Laboratory Technician	X	X						
Laboratory Manager	X	X	X		X			

^a Refer to the WTP Dangerous Waste Training Plan for a complete description of coursework in each training category.

1
2

1
2
3
4
5

This page intentionally left blank.