CHAPTER 8.0
PERSONNEL TRAINING

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8.0 PERSONNEL TRAINING

This chapter discusses personnel training requirements based on Washington Administrative Code (WAC) 173-303 and the *Dangerous Waste Portion of the Resource Conservation and Recovery Act Permit for the Treatment*, Storage, and Disposal of Dangerous Waste (Ecology 1994a), hereafter referred to as "the Permit".

Permit Condition II.C (Personnel Training) contains training requirements applicable to Hanford Facility personnel and non-facility personnel.

Compliance with these requirements at the Waste Treatment and Immobilization Plant (WTP) is demonstrated by information contained in both *Permit Attachment 5* and this chapter. A WTP Dangerous Waste Training Plan will be submitted for incorporation into the Administrative Record prior to initial receipt of waste to meet Compliance Schedule Item 7. This chapter will be updated and resubmitted for agency approval prior to initial receipt of waste, in accordance with Compliance Schedule Item 6.

8.1 Outline of Introductory and Continuing Training Programs

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

- Teach WTP personnel to perform their duties in a way that ensures the WTP's compliance with WAC 173-303 and this Permit.
- Teach WTP personnel dangerous waste management procedures (including implementation of the contingency plan) relevant to the job titles and positions in which they are employed.
- Ensure that WTP personnel can respond effectively to emergencies.

8.1.1 Introductory Training

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

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

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

Emergency Coordinator Training: WTP personnel who perform emergency coordinator duties as specified in WAC 173-303-360 (for example, the Building Emergency Director) in the Hanford Incident Command System receive training on implementation of the Contingency Plan and fulfilling the position within the Hanford Incident Command System.

These WTP personnel will also become thoroughly familiar with applicable Contingency Plan documentation, operations, activities, location, and properties of waste handled, location of records, and the unit and building layout.

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

- Whether a general training course exists.
- The training needs to ensure waste management unit compliance with WAC 173-303.
- Training commitments agreed to with the Washington State Department of Ecology.

8.1.2 Continuing Training

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

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

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

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

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

8.2 Description of Training Design

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

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

Waste management duties include those specified in Section 8.1, as well as those contained in WAC 173-303-330(1)(d). Training elements of WAC 173-303-330(1)(d) applicable to WTP operations include the following:

- Procedures for using, inspecting, repairing, and replacing emergency equipment and monitoring equipment.
- Key parameters for automatic waste feed cut-off systems.
- Communications or alarm systems.
- Response to fires or explosions.
- Response to groundwater contamination incident.
- Shutdown of operations.

WTP personnel who perform these duties receive training specific to their duties. The WTP Dangerous Waste Training Plan described in Section 8.3 will contain detailed course curricula for the types of training WTP personnel receive based on the outline in Section 8.1.

8.3 Description of Training Plan

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

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

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

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

1. -330(2)(a): "The job title, job description, and name of the employee filling each job. The job description will include requisite skills, education, other qualifications, and duties for each position."

   Description: The specific WTP personnel job title and position is correlated to the waste management duties. Waste management duties relating to WAC 173-303 are correlated to training courses to ensure training is properly assigned.

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

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

2. -330(2)(b): "A written description of the type and amount of both introductory and continuing training required for each position."

   Description: In addition to the outline provided in Section 8.1, training courses developed to comply with the introductory and continuing training programs are identified and described in the WTP Dangerous Waste Training Plan. As discussed above in Section 8.2, the training plan will be updated to include detailed course curricula for the types of training WTP personnel receive based on the outline in Section 8.1. The type and amount of training is specified in the training plan. Table 8-1 is included as an example of a typical training matrix that shows typical job/titles and positions matched to a training category. The WTP Training Plan will be developed and submitted in accordance with Permit Condition III.10.C.7, and will include dangerous waste management related job titles and position descriptions, and the type and amount of initial, refresher, and on-the-job training required for each.

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

   Description: Training records are maintained consistent with Permit Attachment 5, Section 5.5.

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.

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