

2014-LTR-1014

Attachment 8

[Permit Attachment FF]

Training Plan

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**PERMIT ATTACHMENT FF**

Personnel Training

MIXED WASTE FACILITY  
RCRA/TSCA PERMIT

**PFNW-R**

Permit Number: WAR 0000 10355

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**PERSONNEL TRAINING**

[WAC 173-303-806(4)(a)(xii), WAC 173-303-330]

**TRAINING PLAN REQUIREMENTS**

The WAC 173-303-330 requirements for training are satisfied by this plan. Table 1.0 identifies how the Training Plan satisfies WAC 173-303-330.

**Table 1.0 Training Plan Requirements of WAC 173-303-330**

<b>Requirement</b>	<b>Training Plan Section</b>
-330(1)(a)- The training program must be directed by a person knowledgeable in dangerous waste management procedures, and must include training relevant to the positions in which the facility personnel are employed;	1.1.4, Page 8, Lines 37-44
-330(1)(b) – Facility personnel must participate in an annual review of the training provided in the training program;	1.1.2, Page 7, Line 33
-330(1)(c) – This program must be successfully completed by the facility personnel:	1.1.2, Page 7, Lines 42 - 45
(i) Within six months after these regulations become effective; or	1.1.2, Page 7, Line 31
(ii) Within six months after their employment at or assignment to the facility, or to a new position at the facility, whichever is later. Employees hired after the effective date of these regulations must be supervised until they complete the training program;	1.1.2, Page 7, Line 31
-330(1)(d) – At a minimum, the training program must familiarize facility personnel with emergency equipment and systems, and emergency procedures. The program must include other parameters as set forth by the department, but at a minimum must include, where applicable:	1.1.6, Page 9, Lines 2 -36
(i) Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment;	1.1.6, Page 9, Lines 21-22
(ii) Key parameters for automatic waste feed cut-off systems;	1.1.6, Page 9, Line 26
(iii) Communications or alarm systems	1.1.6, Page 9, Line 23
(iv) Response to fires or explosions;	1.1.6, Page 9, Line 24
(v) Response to ground-water contamination incidents; and	1.1.6, Page 9, Line 27
(vi) Shutdown of operations.	1.1.6, Page 9, Line 25
-330(2) – Written training plan. The owner or operator must develop a written training plan which must be kept at the facility and which must include the following documents and records:	Attachment FF is the written training plan
(a) For each position related to dangerous waste management at the facility, the job title, the job description, and the name of the employee filling each job. The job description must include the requisite skills, education, other qualifications, and duties for each position;	4.0, Page <del>165</del> Line 1 through Page <del>176</del> Line <del>220</del>
(b) A written description of the type and amount of both introductory and continuing training required for each position; and	Table 2, <u>Page 18</u>
(c) Records documenting that facility 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 include the following documents and records.	1.1.4, Page 8, Lines 46-49 2.0, Page 10, Lines 10-14
-330(3) Training records. Training records on current personnel must be kept until closure of the facility. Training records on former employees must be kept for at least three years from the date the employee last worked at the facility. Personnel training records may accompany personnel transferred within the same company.	2.0, Page 10, Line 10-14

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**ACRONYMS**

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AWFCOs	Automatic Waste Feed Cut-Offs
CPR	Cardiopulmonary Resuscitation
DOT	Department of Transportation
ES&H	Environment, Safety and Health
<del>GASVIT™</del>	<del>Gasification/Vitrification</del>
HAZCOM	Hazard Communication
HAZWOPER	Hazardous Waste Operations and Emergency Response
MWF	Mixed Waste Facility
OJT	On-The-Job Training
RCRA	Resource Conversation and Recovery Act
TSD	Treatment Storage and Disposal
WAC	Washington Administration Code

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**1.0 PERSONNEL TRAINING**

The training program is in place for the management of radioactive and dangerous waste herein after referred to as mixed waste at the Mixed Waste Facility (MWF). The training program conforms to the requirements of the Washington Administration Code (WAC). The training program provides for both initial and continuing training for all personnel. This program enables mixed waste personnel to work safely and to understand the significance of hazards, while ensuring that mixed waste is handled in a manner that protects human health and the environment.

Section 1.1 provides an outline of the training program for mixed waste personnel at the MWF and Section 2.0 describes the implementation of the training program. Section 3.0 provides descriptions of the required training courses for MWF personnel.

**1.1 Outline of Training Program**

The goal of the training program for mixed waste personnel is to prepare employees to operate and maintain the MWF in a safe, effective, efficient, and environmentally sound manner. To meet these objectives, the training program covers personnel safety, protective clothing and equipment, decontamination procedures, and normal mixed waste management operations and maintenance. In addition to preparing employees to operate and maintain the MWF under normal conditions, the training program ensures that employees are prepared to respond in a prompt and effective manner should abnormal or emergency conditions occur. Emergency response training will be consistent with emergency responses outlined in the Contingency Plan.

**1.1.1 Job Title/Job Description**

A MWF job description has been developed for each position relative to mixed waste management. The job description will include the following:

- Job title and written description of the duties and requisite skill, training, or other qualifications for the employee assigned to that position.

All MWF job descriptions can be obtained from the Human Resources organization. The job descriptions for mixed waste management personnel can be divided into the two following general categories:

- 1) Positions that entail mixed waste management as a primary function; and
- 2) Positions that entail mixed waste management as an incidental function.

In general, all personnel working in the MWF are required to demonstrate the following:

- The ability to understand and apply both oral and written instructions at a level appropriate to the assigned job;
- Possess the aptitude and attitude necessary to ensure compliance with job and safety requirements; and
- Be physically capable of doing the work.

1 **1.1.2 Training Content**  
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3 The training program provides both initial and continuing training for personnel involved in mixed waste  
4 management. Training requirements for personnel who directly manage mixed waste differs significantly  
5 from the requirements for those who do not directly manage mixed waste. For the purposes of this  
6 training plan, three categories of employees are defined as follows:  
7

8 Supervisor/Lead. A facility supervisor/lead is an individual who works inside the MWF and who  
9 supervises or leads facility workers. Supervisor/leads are required to complete the training outlined in  
10 Section 3.0. The following are typical job titles and are not all inclusive job titles for such individuals:  
11

- 12 • Mixed Waste Thermal Supervisor/Leads
- 13 • Mixed Waste Non-Thermal Supervisor/Leads
- 14 • Health Physics Supervisor/Leads
- 15 • Maintenance Supervisor/Leads
- 16

17 Facility Operations Worker. A facility worker is an individual who directly handles mixed waste or is  
18 directly supporting the management of mixed waste (e.g., Health Physics). Facility workers are required  
19 to complete the training outlined in Section 3.0. Typically, facility workers include those who:  
20

- 21 • Sample/inspect incoming mixed waste shipment
- 22 • Unload or transfer mixed waste to or from containers, tanks, storage, or treatment
- 23 • Are involved in handling mixed waste for treatment
- 24 • Conduct inspections
- 25 • Are involved in decontamination activities
- 26 • Are involved in operation of treatment equipment
- 27

28 The following are typical job titles and are not all inclusive job titles for such individuals:  
29

- 30 • Mixed Waste Thermal Technicians
- 31 • Mixed Waste Non-Thermal Technicians
- 32 • Health Physics Technicians
- 33 • Maintenance Technicians
- 34 • Laboratory/Sample Management Technicians
- 35 • Compliance/Quality Control Technicians
- 36

37 Administrative/Executive Staff. Individuals who are not involved in handling mixed waste are not  
38 mandated to complete the training outlined in Section 3.0. Nonetheless, some of these individuals may be  
39 trained as part of the Permittee's policy. These individuals largely perform administration/business roles  
40 for the MWF and typically enter the MWF occasionally ~~or~~ for routine review, orientation, support, or  
41 guidance purposes.  
42  
43  
44  
45  
46

The following are typical job titles and are not all inclusive job titles for such individuals:

Managers

- Chief Operating Officer(s)
- Vice President/General Manager
- Regulatory Compliance Officer
- Environmental, Safety, Health, & Quality Manager
- Radiation Safety Officer

Administrative

- Executive Assistants
- Secretaries
- Receptionists, etc.
- Material Control Technician

Engineering

- Engineers

Business

- Business Manager
- Marketing Personnel
- Accountants

Other

- Industrial Hygiene and Training Coordinator
- Visitors
- Auditors
- Contractors

All initial training is completed within six months of the hiring date. Employees who are assigned to a new position inside the MWF must meet the training requirements of that position within six months of the assignment. Additionally, each employee receives annual refresher training.

Section 3.0 presents a description of each training topic. Facility Operations Workers and Supervisor/Leads are not allowed to work unsupervised in the MWF until they have taken and successfully completed the initial training courses. For the purposes of this plan, working under supervision includes having work tracked or reviewed by an experienced lead or supervisor. Supervision does not mean that the employees will never leave the sight of the assigned overseer, but it does mean that the employee shall not be assigned to complete waste management tasks without guidance.

Training at the MWF may be followed by tests, hands-on demonstrations, or verbal discussions to determine the level of comprehension upon completion of most of the training. All training and training courses have established criteria for successfully completing training and those personnel not meeting the criteria are retrained until the criteria are met.

**1.1.3 Training Techniques**

Primarily two types of training programs are utilized at the MWF. The two types are classroom and on the job training.

1.1.3.1 Classroom Training:

Formalized training predominately consists of traditional classroom training. This style of training is primarily used for major topics. Instructors may prepare lesson plans, quizzes and may use videos, handouts, and other instructional aids to assist in teaching. This type of training may also be computer based. Classroom training is documented and maintained by Document Control.

In addition to classroom training personnel may be required on a periodic basis to read and understand procedures and policies.

1.1.3.2 On the Job Training (OJT):

OJT provides instruction that may be general to all mixed waste positions or that may be specialized for a particular task. OJT is accomplished, but not limited to, the following:

- providing verbal directions,
- topic specific handouts and
- direct ‘hands on’ experience to help employees learn safe work practices and practical applications of environmental protection, mixed (hazardous and radiological) waste management and regulatory compliance related to the employee’s duties.

On-the-Job training is documented on the employee’s Qualification Card. Not all job positions require Qualification Card (see Table 2.0). A status of all facility workers qualification cards will be maintained by Document Control. A “Qualification Card Reference Book” has been developed that corresponds to the qualification card. The “Qualification Card Reference Book” explains what OJT is required to successfully complete each line item on the Qualification Card.

Each portion of the training program is directed by personnel trained and/or experienced in that discipline. Outside contractors may teach certain courses under the direction, guidance, or approval by facility management. A majority of the training takes place onsite. Depending on the situation, courses may be taught offsite. Continuation training, including an annual review of the initial training, is also part of the training program.

**1.1.4 Mixed Waste Facility Training Director**

When no one individual designated as the training director (i.e., Safety and Training Coordinator) the roles and responsibilities are shared among the various managers. Using this system ensures that training is led by the individual with the most knowledge concerning a particular area of mixed waste management. All instructors (whether employees or contractor personnel) must have either satisfactorily completed a subject-specific training program or possess relevant academic credentials, or job-related experience.

A training matrix for each employee at the MWF is maintained by Document Control. Table 2.0 contains a training matrix that identifies required training by job title. In addition, Document Control maintains a status of the Qualification Cards for MWF personnel. Each employee’s supervisor has ultimate responsibility for ensuring that training requirements are successfully completed.

1 **1.1.5 Relevance of Training to Job Position**

2  
3 Each worker involved in mixed waste management receives training relevant to the duties and  
4 responsibilities entailed by their position. Additionally, the level of emergency response training depends  
5 on the responsibilities of the position. This is because different positions require different knowledge to  
6 perform the job duties safely and effectively. Establishing training requirements specific to each job  
7 position ensures that training is relevant to the duties and responsibilities of that job.  
8

9 A majority of the training for mixed waste operations personnel is OJT. This allows each worker to  
10 obtain practical knowledge needed for their position as well as general issues that affect all mixed waste  
11 personnel.  
12

13 **1.1.6 Training for Emergency Response**

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15 Emergency response training is designed and structured to ensure that all mixed waste personnel are  
16 trained to respond effectively to emergency situations, and to maintain compliance with applicable permit  
17 requirements and environmental regulations during emergencies. This training addresses non-routine  
18 situations that could lead to an emergency involving mixed waste if proper responses are not  
19 implemented. Subjects covered in this training include:  
20

- 21 • Procedures for locating, using, inspecting, repairing and replacing MWF emergency and  
22 monitoring equipment;
- 23 • Communication on alarm systems;
- 24 • Responses to fires, explosions, or other releases;
- 25 • Shutdown of operations and evacuation;
- 26 • ~~Key parameters for automatic waste feed cut-off systems; and~~
- 27 • Response to ~~shutdown of operations~~ groundwater contamination incidents.  
28

29 Additional topics covered during emergency response training may include:

- 30
- 31 • The chemical characteristics of the waste to be managed, such as reactivity, toxicity, ignitability,  
32 and corrosivity;
- 33 • Knowledge of what to do in the event of a spill or leak;
- 34 • The types of protective equipment, respirators and other protective clothing to be worn;
- 35 • Knowledge of basic first aid; and
- 36 • Who to inform in the event of an emergency.  
37

38 Cooperative agreements have been reached with local and regional response agencies. Copies of these  
39 agreements are included as Appendix B to the Contingency Plan (~~which is~~ Attachment GG of the ~~facility~~  
40 permit).  
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2                   **2.0     IMPLEMENTATION OF TRAINING PROGRAM**  
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4     The training program for mixed waste is in place and has been fully implemented. All personnel  
5     associated with mixed waste management at the MWF must complete the training program within six  
6     months after the date of their employment, assignment to MWF, or transfer to a new position within the  
7     MWF. Personnel are not allowed to work unsupervised until they have completed the training program.  
8     Annual refresher training is provided to all mixed waste personnel.  
9

10    Training records, including a course attendance record, examination grades, and any certification  
11    received, are kept in each employee's training file. Training records or copies are included in each  
12    employee's training file. The training file for each employee is maintained throughout tenure and for a  
13    period of three years from the date the employee last worked at the facility. Training records for  
14    employees will be made available upon request from regulatory agencies.  
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**3.0 TRAINING TOPICS**

A brief description of the training courses related to mixed waste management is provided in the following sections.

**3.1 Mixed Waste General Orientation and Awareness Training - Initial**

**Course Description**

This course provides a general orientation of the MWF policies and procedures.

**Course Objectives**

The objective of this course is to familiarize personnel with the MWF policies and procedures, facility operations, hazards in the workplace, and the appropriate response to emergency signals.

**Course Content**

General Orientation

- Overview of MWF policies and procedures
- MWF layout
- Emergency signals and responses
- Rest room areas
- Housekeeping
- Restrictions of eating, smoking, and chewing areas

Mixed Waste Awareness

- Overview of state and federal dangerous waste regulations
- Overview of state and federal radiation protection regulations
- Overview of MWF operations
- Overview of MWF hazards communication program

**3.2 Hazardous Worker – 40 Hour Initial and 8 Hour Annual Update**

The Hazardous Worker Training herein refers to the Hazardous Waste Operations and Emergency Response (HAZWOPER) Training. Additionally, completion of the HAZWOPER - 40 Hour class provides coverage for two additional classes (e.g., “Contingencies and Emergency Equipment” and “Personal Safety and Preparedness”). The objective of this course is to familiarize students with the hazards associated with hazardous waste operations. The HAZWOPER class covers the following:

**Legislation and Regulations:**

- Orientation of the regulation, history and the MWF
- Recent changes or updates in the regulations

**Health and Toxicology:**

- Work place monitoring
- Material Safety Data Sheets

**Medical Programs:**

- Hazardous materials handling
- Annual physical
- Respiratory protection
- Bloodborne pathogens
- Work place monitoring

**Hazard Recognition and Evaluation:**

- HAZCOM
- Job hazard analysis/checklists
- Work place violence
- Material Safety Data Sheets

**Site Specific Hazards and Controls:**

- Radiation
- Power tools/machine guards
- Power trucks
- Electrical hazards
- Confined space
- Welding
- Cutting
- Hot work conditions
- Lock and Tag
- Fire hazards
- Oxygen deficient atmosphere
- Vapors
- Particulate contaminants
- Slip/Trip/Fall
- Heat stress/cold stress

**Personal Protective Equipment:**

- Level A, B, C, and D protective equipment
- Respiratory protection limitations

**Site Plans, Policies, Planning, Work Practices and Procedures**

- Occupational Health and Safety procedures
- Operation procedures
- Radiation work permits
- Process Data Sheets

**Work Permits:**

- Radiation Work Permits
- Process Data Sheets

**Emergency Response:**

- Emergency paper work with shipments
- Containment of hazardous materials
- Spills
- Incident Command System

The 8 Hour Annual Refresher class will cover selected topics from the list of topics covered by the 40 Hour Class.

**3.3 Contingencies and Emergency Equipment - Initial**

**Course Description**

This course introduces emergency equipment and the MWF contingency plan.

**Course Objective**

The objectives of this course are to ensure the ability to respond effectively to emergencies and familiarity with MWF emergency equipment and procedures.

**Course Content**

Contingencies

- Contingency implementation procedures
- Telephone numbers and contact names
- Alarms or communication equipment (radios, landlines, cell phones)
- Company policies
- Shutdown of operations
- Site evacuation procedures
- Introduction to the Contingency Plan and Emergency Response Plan

Emergency Equipment

- Decontamination equipment
- Monitoring equipment
- Portable fire extinguishers
- Spill control equipment
- Continuous air monitors
- Inspecting, repairing, and replacing facility emergency and monitoring equipment

**3.4 Personnel Safety and Preparedness - Initial**

**Course Description**

This course introduces personal safety and preparedness programs and policies of the MWF.

**Course Objective**

The objectives of this course are to ensure familiarity with:

- Safety policies and procedures, and
- MWF procedures to prevent hazards.

**Course Content**

Personnel Safety

- Access and use of internal communication and alarm system

- Access and use of telephone, emergency names and numbers
- Care in handling waste
- Exposure routes
- Lock and tag program
- Fall protection program

Preparedness

- Review of procedures to prevent hazards
- Precautions for ignitable, reactive, and incompatible materials
- Safety precautions during management of waste
- Safety equipment
- Sparks and sources of ignition
- Site security

**3.5 Treatment Storage and Disposal (TSD) Training**

**Course Description**

This course is designed to provide an overview of the various aspects of managing mixed waste at a treatment and storage facility.

**Course Objective**

The objective of this course is to provide skills and knowledge to carry out tasks in a way that ensures the MWF treatment and storage operations are performed in compliance with the facility permit and applicable state and federal requirements.

**Course Content**

General Course Content

- Waste handling
- Waste compatibility
- Waste segregation in storage
- Waste segregation during treatment
- Storage areas operations
- Waste treatment selection
- Process data sheets
- Radiological control during treatment operations

Specific Course Content

- Treatment formula development for stabilization
- ~~Gasification/Vitrification (GASVIT™) feed rate calculations~~
- ~~Automatic waste feed cut offs (AWFCOs)~~
- Treatment line 100 operation startup and shut down
- Treatment line 200 operation startup and shut down
- Treatment line 300 operation startup and shut down
- Treatment line 400 operation startup and shut down
- Treatment line 500 operation startup and shut down
- Unloading treatment units
- Cleaning out treatment units
- Secondary waste generation
- Responses to ground water contamination

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**3.6 Mixed Waste Management for Generators**

**Course Description**

This course reviews the state and federal regulation for managing mixed waste. It also covers the activities associated with receiving, storing, and shipping waste at the MWF.

**Course Objective**

The objective of this course is to provide employees the skills and knowledge to carry out their duties in a way that ensures the MWF receives, stores, and ships waste in compliance with the facility permit and applicable state and federal requirements.

**Course Content**

General Course Content

- Definition of hazardous waste
- Definition of radioactive material
- Overview of the Land Disposal Ban requirements (both state and federal)
- DOT Classifications
- DOT Labels/Markings/Placards
- State regulation requirements for generators
- Federal regulation requirements for generators
- Overview of MWF generated waste
- State regulation for treatment facilities
- Federal regulation for treatment facilities

Specific Course Content

- Approval of incoming shipments
- Incoming waste analysis
- Waste tracking system
- Manifest generation
- Manifest review and discrepancy reporting
- On-site laboratory operations
- Records
- Sampling
- Waste profile sheets
- Waste pre-acceptance
- Waste acceptance
- Waste discrepancy and rejection

4.0 POSITIONS REQUIRING TRAINING

4.1 Facility Supervisors/Leads

Information relevant to these positions is as follows:

4.1.1 Job Title(s):

- Supervisors
- MW Operations Leads
- Maintenance Leads
- Health Physics Leads

4.1.2 Job Description:

Directs work flow and manages hazardous wastes generated in the MWF from either operations or maintenance activities.

4.1.3 Requisite Skills:

There are no requisite skills, educational requirements, or other qualifications required for these positions.

4.1.4 Duties:

In addition to the duties of facility operation worker, these employees are also responsible for the proper management of hazardous wastes generated in the MWF.

4.1.5 Required Training:

These employees are required to be familiar with the information described in Section 3.0.

4.1.6 Qualified Individuals:

Identification of personnel qualified for these positions can be obtained from Human Resources.

4.2 Facility Operations Worker

The following are typical job titles and are not all inclusive job titles for such individuals.

4.2.1 Job Title(s):

- Mixed Waste Thermal Technicians
- Mixed Waste Non-Thermal Technicians
- Health Physics Technicians
- Maintenance Technicians
- Laboratory/Sample Management Technicians
- Compliance/Quality Control Inspector

4.2.2 Job Description(s):

A facility worker is an individual who directly handles mixed waste or is directly supporting the management of mixed waste (e.g., Health Physics). Facility workers are required to complete the training outlined in Section 3.0.

4.2.3 Requisite Skills:

There are no requisite skills, educational requirements, or other qualifications required for these positions.

1           **4.2.4 Duties:**

2           These individuals are responsible for the proper management and storage of hazardous  
3           wastes stored in the MWF.

4  
5           Typically, facility workers include those who:

- 6           • Sample/ visually inspect incoming mixed waste shipment
- 7           • Unload or transfer mixed waste to or from containers, tanks, storage, or treatment
- 8           • Are involved in handling mixed waste for treatment
- 9           • Conduct inspections of waste, the facility or receipts and outgoing shipments
- 10          • Are involved in decontamination activities
- 11          • Are involved in operation of treatment equipment
- 12          • Are involved in the maintenance of treatment equipment
- 13          • ~~Are involved in the P~~proper management of samples

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16           **4.2.5 Required Training**

17           These individuals are required to be familiar with the training topics contained in  
18           Section 3.0.

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20           **4.2.6 Qualified Facility Workers:**

21           Identification of personnel qualified for these positions can be obtained from Human  
22           Resources.  
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**TABLE 2.0 Training Matrix**

	MW General Orientation and Awareness	Hazardous Worker Operation 40 Hr - Initial	Contingencies & Emergency Equipment - Initial	Personnel Safety & Preparedness - Initial	Treatment/Storage/Disposal	Mixed Waste Management for Generators	8-Hour Update - Annual	Qualification Card Required	Waste Profiling	Shipping of Radioactive Material & Waste- LLOP 405
<b>Administrative/Executive Staff</b>										
Contractors (Badged)	X									
Administration, Business	X									
Engineering	X	X	X	X	X		X			
Managers	X	X	X	X	X	X	X		X	X
Regulatory Compliance Officer Industrial Hygiene & Training Coordinator	X	X	X	X	X	X	X		X	X
	X	X	X	X			X			X
<b>Operations Staff</b>										
Mixed Waste Supervisors	X	X	X	X	X	X	X			
Mixed Waste Leads	X	X	X	X	X	X	X	X	X	
Mixed Waste Non-Thermal Tech.	X	X	X	X	X	X	X	X		
Health Physics Leads	X	X	X	X	X	X	X	X		
Health Physics Technicians	X	X	X	X	X	X	X	X		
Quality Assurance/Control Inspectors	X	X	X	X	X	X	X	X	X	X
Lab Tech./Sample Tech.	X	X	X	X	X		X			
Maintenance Supervisor	X	X	X	X			X			
Maintenance Technicians	X	X	X	X			X			
Materials Transfer Technicians	X				X					X
Waste Acceptance Specialist	X	X			X		X		X	
Low Level Non-Thermal Supervisors/Leads								X		
Low Level Non-Thermal Operations								X		
Low Level Thermal Supervisor/ Leads	X	X					X	X		
Low Level Thermal Operations								X		

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**TABLE 3.0 Instruction Hour Breakdown**

<b>Course Title</b>	<b>Classroom</b>	<b>On-The-Job</b>
General Orientation	2	0
Waste Profiling	40	Up to six months to complete
Waste Treatment, Storage, and Disposal		Up to six months to complete
Personnel Safety And Preparedness		Up to six months to complete
Contingencies and Emergency Equipment		Up to six months to complete
Manifesting and Shipping	24	Up to six months to complete