

# PERMIT ATTACHMENT CC

## Personnel Training – Section 8 of the Permit Application

Permit Number: WA 7890008967

The following listed documents are hereby incorporated, in their entirety, by reference into this Permit. Some of the documents are excerpts from the Permittees' DBVS Facility Research, Development, and Demonstration Dangerous Waste Permit Application dated May 10, 2004 (document #04-TED-036); hereafter called the Permit Application. Ecology has, as deemed necessary, modified specific language in the attachments. These modifications are described in the permit conditions (Parts I through V), and thereby supersede the language of the attachment. These incorporated attachments are enforceable conditions of this Permit, as modified by the specific permit conditions.

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1 **8.0 PERSONNEL TRAINING**

2 **8.1 INTRODUCTION**

3 All operations and maintenance personnel assigned to processing systems, support services, and  
4 treated waste handling activities under the RD&D project will participate in routine health and  
5 safety training programs and will be thoroughly trained for the specific tasks they are assigned to  
6 perform.

7 Personnel will be trained in accordance with WAC 173-303-330 and as required by the *Hanford*  
8 *Emergency Management Plan* (DOE/RL-94-02).

9 Prior to the initial receipt of dangerous and/or mixed waste in the Test and Demonstration  
10 Facility, the Permittees shall update and resubmit a final Training Program description to  
11 Ecology for review and approval. The final Training Program description shall include but not  
12 be limited to:

- 13 • Detailed unit specific and general Training Program descriptions consistent with  
14 WAC 173-303-806(4)(a)(xii).
- 15 • Sufficient detail to document that the training and qualification program for all categories  
16 of personnel whose activities may reasonably be expected to directly affect emissions  
17 from the Test and Demonstration Facility.

18 **8.2 OUTLINE OF TRAINING PROGRAMS**

19 The introductory and continuing training programs are designed to prepare personnel to manage  
20 and conduct RD&D activities in a safe, effective, and environmentally sound manner. Training  
21 programs ensure that personnel are prepared to respond in a prompt and effective manner should  
22 abnormal or emergency conditions occur. Emergency response training will be consistent with  
23 the description of actions contained in the Contingency Plan (Section 10.0 and Appendix C).

24 The introductory and continuing training programs will include:

- 25 • Training treatment system supplier and subcontractor personnel to perform their duties in  
26 a way that ensures compliance with WAC 173-303.
- 27 • Training treatment system supplier and subcontractor personnel on dangerous waste  
28 management procedures (including implementation of the contingency plan) relevant to  
29 the job titles and positions in which they are employed.
- 30 • Ensuring that treatment system supplier and subcontract personnel can respond  
31 effectively to emergencies.

32 **8.2.1 Introductory Training**

33 Introductory training includes general Hanford Facility training on Material Safety Data Sheets  
34 for hazardous material and technology-specific training related to the Test and Demonstration  
35 Facility.

1 All personnel will have successfully completed introductory training before operation of the Test  
2 and Demonstration Facility. All new operating personnel will be required to successfully  
3 complete the training program upon assignment to the project. Employees will not work in  
4 unsupervised positions until they have completed the training required for the position.

### 5 **8.2.2 Continuing Training**

6 Continuing training to meet the requirements of WAC 173-303-330(1)(b) includes general  
7 Hanford Facility training and Test and Demonstration Facility-specific training.

8 A training program will be conducted prior to the start of each test campaign and during the  
9 campaign, as required.

### 10 **8.3 DESCRIPTION OF TRAINING DESIGN**

11 Proper design of a training program ensures personnel performing duties related to  
12 WAC 173-303-330(1)(d) are trained to perform their duties in compliance with WAC 173-303.  
13 Actual job tasks, referred to as duties, are used to determine training requirements as follows:

- 14 • The *first step* in ensuring that personnel have received the proper training is to determine  
15 and document specific WRS and DBVS system operation and maintenance and waste  
16 management duties by job title and/or position.
- 17 • The *second step* is to compare specific duties to the unit-training curriculum. If the  
18 general unit-training curriculum does not address the duties, then the training curriculum  
19 is supplemented and/or the necessary on-the-job training is provided.
- 20 • The *third step* is to summarize the training course content necessary to ensure that the  
21 training provided for each job title and position addresses duties associated with that  
22 position.
- 23 • The *final step* is to assign job-specific training curricula to facility and treatment system  
24 supplier and subcontractor personnel, based on their most recent position evaluations.

25 The training plan will be developed when the WRS and DBVS reaches final design and will  
26 include all applicable requirements specified in WAC 173-303-330(1)(d). The plan will include  
27 a chart indicating project personnel positions, their project functions, and the training required  
28 for those positions, including on-the-job training.

29 Training elements of WAC 173-303-330(1)(d) applicable to the WRS and DBVS operations  
30 include the following:

- 31 • Procedures for using, inspecting, repairing, and replacing emergency and monitoring  
32 equipment
- 33 • Key parameters for automatic waste feed cut-off systems
- 34 • Communications or alarm systems
- 35 • Response to fires or explosions
- 36 • Shutdown of operations.

1 **8.4 TRAINING PROGRAM UPDATES**

2 The training program is tiered to provide training updates to personnel at levels that are relevant  
3 to their positions within the system operation. Updates will include:

- 4 • The status of treatment operating conditions and procedures, noting areas where there are  
5 problems or the potential for problems. Employees will be encouraged to participate in  
6 developing effective solutions.
- 7 • The requirements contained in the RD&D permit and other applicable permits, noting  
8 any changes that have occurred since the last update or upon extension of the RD&D  
9 permit. Areas of actual or potential compliance problems will be identified and discussed  
10 and effective solutions will be sought.
- 11 • Incidents that have occurred since the last update that warranted use of safety plans  
12 and/or emergency action. This review focuses on the cause of the incident and  
13 identification of steps to be taken to prevent or to ensure better handling of such events in  
14 the future.

15 **8.5 TRAINING PLAN DOCUMENTATION AND RECORDKEEPING**

16 The training plan documentation consists of one or more documents and/or a training database  
17 with all the components identified in the core document WAC 173-303-330(2)(c): "Records  
18 documenting that personnel have received and completed the training required by this section.  
19 The Department may require, on a case-by-case basis, that training records include employee  
20 initials or signature to verify that training was received."

21 Records of training content, attendance, and certifications will be maintained at the facility.  
22 These records will be made available for review by applicable regulatory agencies. All records  
23 will be maintained in compliance with applicable OSHA, Ecology, or Washington Department of  
24 Health regulations.

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