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Author(s): Bret Peck

Checked by: Peter Stromberg

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Approved by: Roger Landon

Approver's position: Job title

Approver's signature: \_\_\_\_\_  
*Signature* *Date*

River Protection Project  
Waste Treatment Plant  
2435 Stevens Center Place  
Richland, WA 99354  
United States of America  
Tel: 509 371 2000

# History Sheet

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0	New Plan to meet training requirements in WAC 173-303-330(2) and WAC 173-303-806(4)(a)(xii).	

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## Acronyms

BED	Building Emergency Director
BEP	Building Emergency Plan
DWP	Dangerous Waste Permit
GET	General Employee Training
OJT	On-The-Job Training
LMS	Learning Management System
OSHA	Occupational Safety and Health Administration
RCRA	Resource Conservation and Recovery Act
WAC	Washington Administrative Code
WTP	Waste Treatment Plant Facility

# 1 Scope

The dangerous waste training program at the Waste Treatment Plant (WTP) Facility is designed to ensure that WTP facility personnel have the knowledge and skills required to perform assigned hazardous waste duties and assigned emergency response duties in compliance with the applicable federal and Washington State dangerous waste regulations. The scope of this training is limited to personnel with job descriptions that include either working with dangerous waste (generation, accumulation, storage, treatment, transport, preparation for shipment), management of dangerous waste or responding to emergencies from a fire, explosion, potential or actual release of dangerous waste or hazardous materials during implementation of the Contingency Plan. This Training Plan incorporates initial and continuing training and has been developed to meet the requirements of WAC 173-303-330(2) and WAC 173-303-806(4)(a)(xii).

## 2 Personnel Training [WAC 173-303-330]

This training plan discusses personnel training requirements based on WAC 173-303-330 and the training program in Chapter 8 of the WTP Dangerous Waste Permit (DWP). The dangerous waste training program consists of introductory and continuing training that is designed to prepare personnel to work in a safe, effective, and environmentally sound manner. In addition, the training program ensures that personnel are prepared to respond in a prompt and effective manner should abnormal or emergency conditions occur. Emergency response training is consistent with the description of actions contained Chapter 7, Building Emergency Plan (BEP).

Permit Condition II.C, Personnel Training, contains training requirements applicable to WTP personnel and non WTP personnel. The outline of how the initial training, continuing training, and how the training program is implemented is found in Section 3.

Training requirements for employees listed in Appendix 1 are developed based on the requirements in WAC 173-303-330. The training program for employees engaged in dangerous waste activities and Contingency Plan implementation consists of a series of training modules, including mandatory basic RCRA training. The modules are designed to provide training to personnel based on the knowledge they need to conduct their job duties.

Department Managers and/or Supervisors are responsible for evaluating the duties assigned to each job description in their department and determining if the job falls into any of the classifications in Appendix 2 – WTP Facility Job Descriptions, and if necessary Contingency Plan implementation. The Department Manager and/or Supervisor works with the Training Department to ensure that employees are assigned required modules and that the training is completed within six (6) months after their employment at the WTP Facility. In addition, WTP Managers and/or Supervisors establish training criteria, review and approve training requests dispositions, approve training packages, review and approve updates to individual's training profiles, and request modifications to individual's training profiles.

## 3 Outline of Training Program [WAC 173-303-330(1), (1)(a), (1)(e), (2)(b)]

The WTP Training Program ensures personnel will be able to perform their specific job assignments. The training program consists of formal and informal training that include classroom, computer-based, and

on-the-job (OJT) training which apply to specific job functions. This training plan contains initial and continuing training programs that contain information addressing the following objectives:

- Train personnel to perform their duties in a way that ensures compliance with WAC 173-303-330
- Train personnel on dangerous waste management procedures (including implementation of the contingency plan) relevant to the job titles/positions in which they are employed, and
- Ensure personnel can respond effectively to emergencies

This training plan meets the Resource Conservation and Recovery Act (RCRA) regulatory requirements by:

- Providing specific training for various dangerous waste management positions
- Providing training that ensures WTP personnel can respond effectively to emergencies
- Ensuring the WTP training program is directed by qualified persons trained in dangerous waste management practices
- Maintaining required documentation at WTP facilities
- Maintaining training records for WTP personnel for at least three years from the date last worked

### 3.1 Initial Training [WAC 173-303-330(1)(c), (1)(d)]

Initial training includes general Hanford Facility training and facility specific training. Facility specific training is provided to personnel allowing them to work unescorted. 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. Additional safety and environmental training, and other required training as dictated by the individuals' assigned positions and the needs of the facility, may also be required. Personnel must be trained within six (6) months after their employment at or assignment to the Hanford Facility, or to a new job title/position at the WTP Facility, whichever is later.

**General Hanford Facility Training:** This training provides an orientation on dangerous waste management activities being conducted and includes the following:

- Description of emergency signals and appropriate personnel response
- Identification of contacts for information regarding dangerous waste management activities
- Introduction to waste minimization concepts
- Identification of contact(s) for emergencies involving dangerous waste
- Familiarization with the applicable portions of the Hanford Emergency Management Plan (Permit Attachment 4)

Permit Condition II.C.4, requires the Permittee to provide the necessary training to non-Facility personnel (i.e., subcontractors) as appropriate for the locations and activities undertaken at the WTP Facility.

**Contingency Plan Training:** Personnel receive training on applicable portions of Permit Attachment 4, Hanford Emergency Management Plan (DOE/RL-94-02) in the General Hanford Facility training. In addition, personnel receive training on Chapter 7, Building Emergency Plan (BEP) to be able to effectively respond to emergencies. Emergency Response Training has been designed to ensure project members receive the appropriate level of response training based on job and regulatory requirements. Project Management, in conjunction with WTP Emergency Response personnel, will ensure the training program meets the requirements of DOE/RL-94-02, the Building Emergency Plan (BEP), and any additional Washington State Administrative Code (WAC) regulatory requirements that may be applicable.

**Emergency Coordinator Training:** WTP personnel who perform facility emergency duties in WAC 173-303-360 (e.g., Building Emergency Director) in the Hanford Incident Command System are trained according to Chapter 8, Personnel Training.

**Operations Training:** Dangerous waste management operations training (e.g., waste designation training, waste shipper training) shall consider the type of activities performed (e.g., tank management inspections). 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. Training provided for specific operations is identified in Appendix 1. This table was developed based on (1) whether a general training course exists, (2) the training needs to verify waste management unit compliance with WAC 173-303-330, and (3) training commitments agreed to with Ecology.

### 3.1.1 Continuing Training

In accordance with the requirements for WAC 173-303-330(1)(b), facility personnel participate in an annual review of training, including general Hanford Facility training and WTP specific training. Other refresher training, permit modifications, revisions to technical documentation, facility baseline changes, regulatory changes, and Student/Instructor Course Evaluations will be reviewed to determine the necessity for changes to training materials. If there is a significant training impact associated with the reviews/changes and technical information—such as operating parameters or the sequence of operations is affected—training materials will be revised to reflect the latest information. In some cases, information related to personnel safety, equipment safety, a threat to the environment, or facility operations may require a more immediate resolution. In these cases, the response may require either written or verbal communications to invoke an immediate change, followed by a formal revision to training materials.

In some cases, the information received will not require a change to a training program but will require the information to be disseminated to facility personnel to reinforce certain aspects of their job responsibilities. Related definitions are as follows:

- **Communication of Information:** Information related to safety of the public or facility workers, the environment, or conduct of facility operations. This type of change/information must be disseminated to facility personnel prior to resuming work. Changes requiring immediate communication can be presented to the workforce during pre-job briefs, supervisor meetings, and safety meetings.
- **Routine:** Information that is editorial in nature, emphasizes an aspect of operations previously presented in the training program, or is administrative in nature. This information can be delivered through administrative notifications that are appropriate for the specific situation.

### 3.1.2 Training Manager [WAC 173-303-330(1)(a)]

The Training Manager is responsible for the training of the WTP Facility personnel. The Training Department is responsible for designing, developing, implementing, monitoring, approving and documenting Training. This includes tracking all initial and refresher training. .

The responsibilities of the Training Manager include:

- Coordinate training of the WTP Facility personnel in the proper operation of the facility in accordance with Federal and Washington State regulations
- Define training policies, plans, and objectives

- Directing and coordinating design, development, implementation, evaluation, and revision of policies, plans, procedures, and objectives of the Training Department
- Schedule training
- Coordinate training activity to ensure training requirements are identified and adequately covered in the Training Program
- Coordinate continuing training, as necessary, to inform personnel of new procedures, provide refresher training, and provide training for new personnel
- Ensure training records are maintained in accordance with WTP Training Procedures, and WAC 173-303-330(2)(c)
- Supervise and evaluate training personnel
- Verify the quality of the Training Program through assessment of evaluations returned by the students and line management
- Ensure that WTP Facility personnel are trained in dangerous waste management and contingency plan implementation, including emergency procedures, and ensure personnel receive training appropriate to their positions
- Ensure periodic assessments/reviews of the Training Records Management System and supporting document files/records are adequate and in compliance with WTP Facility requirements.

### **3.2 Implementation of Training Plan [WAC 173-303-330(1)(d)]**

After completion of new employee orientation, WTP Facility personnel enter a training program specific to their job assignment. Job assignments, which are required for the completion of a training program, have time and performance limitations that must be satisfied to meet program qualification criteria.

Training of WTP Facility personnel is required to be completed within the first six months their employment, specific to his/her job assignment and throughout the training program until training has been successfully completed personnel do not perform their job assignments unsupervised.

#### **3.2.1 Review of the Training Program [WAC 173-303-330(1)(b)]**

WTP training provides for frequent, systematic review of the various components of the training program through multiple processes.

- WTP Facility employees are required to complete General Employee Training (GET) on an annual basis as described in Appendix 1, WTP training Course Descriptions. This training is subject to biennial evaluation by GET Approval Authorities who review, and revise GET lessons when deemed necessary.
- WTP accounts for rule changes, facility changes, observed difficulties, and staff feedback to incorporate changes to training curricula, and/or frequency to address new or changing circumstances.
- Another criteria of the training program is to ensure employees have the correct training assigned and that it is accurately completed in the designated timeframe. To accomplish this, employee training plan reviews are conducted by their assigned manager.
- The effectiveness of the training program is determined by reviewing student feedback (e.g. evaluation forms), evaluating student performance (e.g., test scores), and performing a regular review of the training course content. If any changes in the training are deemed necessary, the training is revised and documented in the unit specific operating record.
- The training matrices included in Appendix 1 indicate regularly scheduled (required) refresher training frequencies of individual courses.

### 3.2.2 Records

Training documents shall be retained in accordance with WTP Facility records and retention procedures; 24590-WTP-GPP-RADM-DM-3002, *Project Records and Information Management*.

Training records on current personnel are retained until closure of the facility and training records of former employees will be kept for at a minimum of three years from the employee's last day worked at the facility. Training records will be maintained using an electronic database, and will support tracking of student records, course records, and appropriate certification records; in accordance with WAC 173-303-330(2)(c). Course completion documentation for personnel are maintained per 24590-WTP-GPP-RATR-TR-1000, Training Program Administration. The course completion documentation contains the course number, course title, and date of completion.

Records for employee training, including any records of qualification, are maintained by the WTP Facility. All training records are maintained in accordance with 24590-WTP-PL-PADC-03-004, *Hanford Tank Waste Treatment and Immobilization Plant Records Retention and Turnover Plan*.

## 4 References

Washington Department of Ecology; Dangerous Waste Regulations Chapter 173-303; Washington Administrative Code 173-303-330

DOE/RL-94-02, *Hanford Emergency Management Plan*

WA7890008967, *Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit, Dangerous Waste Portion, for the Treatment, Storage, and Disposal of Dangerous Waste, Part III, Operating Unit Group 10 (Waste Treatment and Immobilization Plant)*

24590-WTP-GPP-RADM-DM-3002, *Project Records and Information Management*

24590-WTP-GPP-RATR-TR-1000, *Training Program Administration*

24590-WTP-PL-PADC-03-004, *Hanford Tank Waste Treatment and Immobilization Plant Records Retention and Turnover Plan*

## Appendix 1 WTP Training Course Descriptions

Course Number	Course Title/Description	Frequency	Location	Job/Position								
				Supervisor/Manager	Waste Handler	Maintenance/Crafts	Lab Technician	Operation Technician	Control Room Technician	Technical Support	Facility Emergency	Training Manager
GET 380	24590-WTP-CRM-TRA-000001, Project GET Initial This course provides the general employee basic general information of safety, security and on the job expectations. Completing this course allows the employee to obtain a DOE Badge.	Initial	WTP Facility	X	X	X	X	X	X	X	X	X
GET 381	24590-WTP-CBT-TRA-000002, Project GET Retrain This course provides the general employee basic general information of safety, security and on the job expectations. Completing this course allows the employee to renew a DOE Badge.	Annual	WTP Facility	X	X	X	X	X	X	X	X	X
CRT 6797	24590-WTP-CRTC-G-06-000001, 40-Hr Hazardous Waste Worker	Initial	WTP Facility	X	X	X	X	X	X	X	X	X
CRT 6816	24590-WTP-CRTC-G-06-000002, 8-Hr Hazardous Waste Worker Refresher Training Proof	Annual	WTP Facility	X	X	X	X	X	X	X	X	X
CRM 2202	24590-WTP-CRM-TRA-020001, Radiological Worker II Initial	Initial	WTP Facility	X	X	X	X	X		X		
CRM 2203	24590-WTP-CRM-TRA-020003, Radiological Worker II Retrain	3 yrs.	WTP Facility	X	X	X	X	X		X		

Course Number	Course Title/Description	Frequency	Location	Job/Position									
				Supervisor/Manager	Waste Handler	Maintenance/Crafts	Lab Technician	Operation Technician	Control Room Technician	Technical Support	Facility Emergency	Training Manager	
CBT 586	24590-WTP-TNGC-G-03-000370, Container Waste Management Course developed based on criteria in WAC 173-303-330, the Hanford Facility RCRA Permit, and correspondence between DOE and the Department of Ecology on dangerous waste training and the identification as such.	Initial	WTP Facility	X	X	X	X				X	X	
WMP01 (CBT)	Radioactive Dangerous Waste Management Process Training for General Workers (24590-WTP-WMP-0003-LP-001 Rev 00)	Initial/Annual	WTP Facility	X	X	X	X	X			X	X	X
WMP02 (CRM/EXM)	Radioactive Dangerous Waste Management Process Training for Waste Generators (24590-WTP-WMP-0003-LP-002 Rev 00)	Initial/Annual	WTP Facility	X		X	X	X			X	X	
TBD	BED – Building Emergency Director Training	Initial	WTP Facility									X	
TBD	BED – Building Emergency Director Refresher Training	Annual	WTP Facility									X	
CRM 2925	Project Emergency/Facility Emergency Director	Initial	WTP Facility									X	

Course Number	Course Title/Description	Frequency	Location	Job/Position									
				Supervisor/Manager	Waste Handler	Maintenance/Crafts	Lab Technician	Operation Technician	Control Room Technician	Technical Support	Facility Emergency	Training Manager	
	Classroom instruction on the Project Emergency and Area Emergency Director's responsibilities per the Emergency Action Plan procedure 24590-WTP-GPP-SIND-003.												
WMP03 (CRM/EXM)	Radioactive Dangerous Waste Management Process Training for Waste Handlers	Initial/Annual	WTP Facility		X								
493	Training Coordinator	Initial	WTP Facility										X
CRM 12435	24590-WTP-CRM-TRA-000077, Training Coordinator Overview	Initial	WTP Facility										X

CBT = Computer Based Training  
 CRT = Certification  
 CRM = Classroom Training  
 GET = General Employee Training  
 OJT = On-the-Job Training  
 WMP = Waste Management Procedure Training  
 Annual = Refresher Training

## Appendix 2 WTP Facility Job Descriptions

Job Title/Position	Job Description	
	Duties	Requisite skills, education, other qualifications
Supervisor/Manager	<ul style="list-style-type: none"> <li>Report discovered spills and releases</li> <li>Evacuate or take cover in response to specific incidents</li> <li>Supervise waste management activities</li> <li>Use emergency and monitoring equipment [WAC 173 303 330(1)(e)]</li> <li>Respond to and use communications or alarm systems [WAC 173-303-330(1)(e)]</li> <li>Respond to fires or explosions [WAC 173-303-330(1)(e)]</li> <li>Manage transfer and shipment of dangerous or mixed waste</li> <li>Prepare and submit environmental records</li> <li>Supervise Waste Handlers in the management of secondary waste</li> </ul>	<p><u>Requisite Skills</u> 1-10 years of Managerial Experience</p> <p><u>Education</u> Bachelor of Science or Equivalent Work Experience</p> <p><u>Other Qualifications</u> WMP01</p>
Waste Handler	<ul style="list-style-type: none"> <li>Report discovered spills and releases</li> <li>Evacuate or take cover in response to specific incidents</li> <li>Interpret sample results and chemical data provided from chemical manufacturers to support waste characterization in the treatment and disposal of secondary waste</li> <li>Perform data quality review/assessment on analytical data for use in generator waste designations</li> <li>Prepare and submit environmental records</li> <li>Certify WTP waste containers for contents and packaging requirements</li> </ul>	<p><u>Requisite Skills</u> 0-3 years of Dangerous Waste/Mixed Waste Related Work Experience</p> <p><u>Education</u> Associate's Degree or Equivalent Work Related Experience</p> <p><u>Other Qualifications</u> WMP01, WMP03</p>
Maintenance/Crafts	<ul style="list-style-type: none"> <li>Report discovered spills and releases</li> <li>Evacuate or take cover in response to specific incidents</li> <li>Perform waste segregation and packaging per procedure</li> <li>Respond to fires or explosions [WAC 173-303-330(1)(e)]</li> <li>Manage waste in Satellite Accumulation Areas</li> </ul>	<p><u>Requisite Skills</u> 3-5 years of Craft Related Experience</p> <p><u>Education</u> Associate's Degree or Equivalent Work Related Experience</p> <p><u>Other Qualifications</u> WMP01, WMP02</p>

Job Title/Position	Job Description	
	Duties	Requisite skills, education, other qualifications
Technical Support	<ul style="list-style-type: none"> <li>• Report discovered spills and releases</li> <li>• Evacuate or take cover in response to specific incidents</li> <li>• Respond to fires or explosions [WAC 173-303-330(1)(e)]</li> <li>• Sample and package waste samples</li> <li>• Receive a transfer or shipment of dangerous or mixed waste</li> <li>• Apply container markings or labels</li> <li>• Setup and manage Satellite Accumulation Areas</li> <li>• Manage 90-Day and Permitted Storage Areas</li> <li>• Prepare waste shipment for both onsite and off-site shipments of dangerous and/or mixed waste</li> <li>• Prepare and submit environmental records</li> <li>• Perform inspections of waste storage areas</li> </ul>	<p><u>Requisite Skills</u> 0-3 years of Related TSD Support Experience</p> <p><u>Education</u> Bachelor of Science or Equivalent Work Experience</p> <p><u>Other Qualifications</u> WMP01, WMP02</p>
Lab Technician	<ul style="list-style-type: none"> <li>• Report discovered spills and releases</li> <li>• Evacuate or take cover in response to specific incidents</li> <li>• Ensure operations are consistent with requirements contained in Dangerous Waste Regulations, WAC 173-303</li> <li>• Prepare and submit environmental records</li> </ul>	<p><u>Requisite Skills</u> 1-5 years of Related Laboratory Experience</p> <p><u>Education</u> Bachelor of Science or Equivalent Work Experience</p> <p><u>Other Qualifications</u> WMP01, WMP02</p>
Operations Technician	<ul style="list-style-type: none"> <li>• Report discovered spills and releases</li> <li>• Evacuate or take cover in response to specific incidents</li> <li>• Generate and handle dangerous or mixed waste during work activities</li> <li>• Prepare and submit environmental records</li> </ul>	<p><u>Requisite Skills</u> 0-3 years of Related TSD Operations Experience</p> <p><u>Education</u> High school diploma</p> <p><u>Other Qualifications</u> WMP01, WMP02</p>
Control Room Technician	<ul style="list-style-type: none"> <li>• Report discovered spills and releases</li> <li>• Evacuate or take cover in response to specific incidents</li> <li>• Prepare and submit environmental records</li> <li>• Ensure operations are consistent with requirements contained in Dangerous Waste Regulations, WAC 173-303</li> </ul>	<p><u>Requisite Skills</u> 0-3 years of related TSD operations experience</p> <p><u>Education</u> High school diploma</p> <p><u>Other Qualifications</u> WMP01</p>

Job Title/Position	Job Description	
	Duties	Requisite skills, education, other qualifications
Facility Emergency	<ul style="list-style-type: none"> <li>• Report discovered spills and releases</li> <li>• Evacuate or take cover in response to specific incidents</li> <li>• Respond to and use communications or alarm systems [WAC 173-303-330(1)(e)]</li> <li>• Provide direction during emergencies, evacuation or take cover</li> <li>• Perform RCRA Emergency Coordinator duties as the BED in Hanford Incident Command System</li> <li>• Prepare and submit environmental records</li> </ul>	<u>Requisite Skills</u> 0-3 years of Related Emergency Response Operations Experience  <u>Education</u> High school diploma  <u>Other Qualifications</u> WMP01
Training Manager	<ul style="list-style-type: none"> <li>• Report discovered spills and releases</li> <li>• Evacuate or take cover in response to specific incidents</li> <li>• Prepare and submit training records</li> <li>• Supervise training personnel</li> </ul>	<u>Requisite Skills</u> 1-10 years of Managerial Experience  <u>Education</u> Bachelor of Science or Equivalent Work Experience  <u>Other Qualifications</u> WMP01, 493-Training Coordinator

RCRA = Resource Conservation and Recovery Act of 1976  
 TSD = Treatment, Storage, and Disposal Facility  
 WAC = Washington Administrative Code  
 WMP = Waste Management Procedure