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

<table>
<thead>
<tr>
<th>Modification Date</th>
<th>Modification Number</th>
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<tr>
<td>03/18/2022</td>
<td>PSNS.2021.1F</td>
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PUGET SOUND NAVAL SHIPYARD (PSNS) &
INTERMEDIATE MAINTENANCE FACILITY (IMF)
ADDENDUM H
PERSONNEL TRAINING
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H. PERSONNEL TRAINING

H.1 Introduction

This Addendum provides a description of the Puget Sound Naval Shipyard and Intermediate Maintenance Facility (PSNS & IMF) Personnel Training Program. This program description includes the elements necessary to demonstrate compliance with Washington Administrative Code (WAC) 173-303-330. Mixed Waste Storage Facility (MWSF) personnel receive training on dangerous waste management procedures relevant to the positions they are employed to ensure proper management and handling of mixed waste and appropriate response to emergency situations involving mixed waste.

The Personnel Training Program is applicable to MWSF personnel. Based on WAC 173-303-040, “personnel or facility personnel” means all persons who work at, or oversee the operations of, a dangerous waste facility, and whose actions or failure to act may result in noncompliance with the requirements of WAC 173-303-400 or 173-303-280 through 173-303-395 and 173-303-600 through 173-303-695. This Addendum is scoped to personnel as defined within the WAC 173-303-040 definition. This Addendum is organized to demonstrate compliance with the applicable WAC 173-303 training requirements, as shown below in Table H-1.

<table>
<thead>
<tr>
<th>WAC 173-303 Requirement</th>
<th>Sub-Section</th>
</tr>
</thead>
<tbody>
<tr>
<td>-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 facility personnel are employed</td>
<td>H.5, H.3</td>
</tr>
<tr>
<td>-330(1)(b) Facility personnel must participate in an annual review of the training provided in the training program</td>
<td>H.4</td>
</tr>
<tr>
<td>-330(1)(c) This program must be successfully completed by the facility personnel; (ii) Within six months after their employment at or assignment to the facility, or to a new position at the facility, whichever is later</td>
<td>H.2</td>
</tr>
<tr>
<td>-330(1)(e) At a minimum, the training program must familiarize facility personnel with emergency equipment and systems, and emergency procedures.</td>
<td>Table H-3</td>
</tr>
<tr>
<td>-330(2) Written training plan. The owner or operator must develop a written training plan which must be kept at the facility</td>
<td>H.7</td>
</tr>
<tr>
<td>-330(2)(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</td>
<td>H.6, H.7</td>
</tr>
<tr>
<td>-330(2)(b) A written description of the type and amount of both introductory and continuing training required for each position</td>
<td>H.3 Table H-3</td>
</tr>
<tr>
<td>-330(2)(c) Records documenting that facility personnel have received and completed the training required by this section.</td>
<td>H.7</td>
</tr>
<tr>
<td>-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.</td>
<td>H.7</td>
</tr>
<tr>
<td>-806(4)(a)(xii) An outline of both the introductory and continuing training programs by owners or operators to prepare persons to operate or maintain the TSD facility in a safe manner as required to demonstrate compliance with WAC 173-303-330. A brief description of how training will be designed to meet actual job tasks in accordance with requirements in WAC 173-303-330(1)(d).</td>
<td>H.3 Table H-3</td>
</tr>
</tbody>
</table>
**H.2 Initial Training**

Section H.3 provides a Training Matrix (Table H-2) including the position descriptions and courses required for proper operation of the MWSF. MWSF personnel assigned to MWSF duties must successfully complete the required initial training within six months of their assignment. Employees are not allowed to work unsupervised in the MWSF until they have completed initial training. See Table H-3 for initial training delivery methods by course.

**H.3 Task-Specific Training**

The content and frequency used for both the initial and continuing training is provided in Table H-3. Table H-3 also outlines delivery methods for continuing training by course. The training plan maintained by PSNS & IMF provides the specific details of course curricula in accordance with WAC 173-303-330(2) and is delivered either by classroom or computer-based instruction. On-the-job training is not used to meet training requirements in this training program. Testing is not required for the courses listed in Tables H-2 and H-3. The course curricula ensure MWSF personnel maintain the MWSF in a safe manner and in a way that ensures the facility’s compliance with the dangerous waste regulations and this Permit. The courses in Table H-2 are designed to provide training tailored and relevant to the assigned position and tasks defined in Section H.6. The courses are intended to stand-alone (i.e., prerequisite training is not required) and cover only those personnel whose actions or failure to act can result in noncompliance.

<table>
<thead>
<tr>
<th>Table H-2 Training Matrix</th>
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<tbody>
<tr>
<td><strong>Position Description</strong></td>
</tr>
<tr>
<td>Mixed Waste Storage Facility Operators and Supervisors</td>
</tr>
<tr>
<td>Mixed Waste Subject Matter Experts and Supervisors</td>
</tr>
<tr>
<td>Mixed Waste Emergency Coordinators</td>
</tr>
<tr>
<td>Mixed Waste Storage Facility Operations Instructors</td>
</tr>
<tr>
<td>Characterization, Waste Analysis Plan, and Recordkeeping Instructors</td>
</tr>
<tr>
<td>Mixed Waste Emergency Coordinator Instructors</td>
</tr>
</tbody>
</table>
### Table H-3 Description of Training Courses

<table>
<thead>
<tr>
<th>Course</th>
<th>Content of Task-Specific Training</th>
<th>Frequency</th>
<th>Delivery Method</th>
</tr>
</thead>
</table>
| Mixed Waste Storage Facility Operations | • Day-to-day MWSF operations.  
• MWSF Inspection requirements.  
• Use and maintenance of emergency equipment.  
• Operating record maintenance.  
• Waste load and unload procedures.  
• Container requirements.  
• Hazards associated with types of wastes stored.  
• Mixed waste spill response.  
• Emergency procedures.  
• MWSF communications and alarms.  
• Response to fire or explosion. | Annual | Initial Training: Classroom instruction.  
Continuing Training: A combination of delivery methods, classroom instruction or computer-based instruction. |
• Waste loading/unloading authorization.  
• Records Retention. | Annual | Initial and Continuing Training: A combination of delivery methods, classroom instruction or computer-based instruction. |
| Mixed Waste Emergency Coordinator      | • Contingency plan actions.  
• Operations and activities at the facility.  
• Location and properties of all wastes handled at the facility.  
• Location of all facility records.  
• Layout of the facility.  
• Emergency notifications. | Annual | Initial and Continuing Training: A combination of delivery methods, classroom instruction or computer-based instruction. |
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H.4 Continuing Training

Continuing training, required by WAC 173-303-330(1)(b), is administered annually. Once each calendar year, trained personnel engaged in MWSF operations receive annual refresher training that encompasses, at a minimum, a review of the course contents listed in Table H-3.

PSNS & IMF uses a database to track employees’ training. Instances of initial and refresher training are entered into the database. Supervisors must verify their workers’ training is up-to-date. Employees whose training has expired are disqualified from performing their duties until training has been completed.

H.5 Training Program Administration

The Mixed Waste Subject Matter Expert (SME) Supervisor is responsible for the mixed waste training program and ensures personnel are appropriately trained to perform their duties and training lesson plans are prepared in compliance with WAC 173-303. The Mixed Waste SME Supervisor receives training in accordance with Table H-2.

Effectiveness of the training program is assessed at PSNS & IMF by supervisory oversight and an audit and surveillance program. Employee performance is evaluated through the observation of operations in progress (e.g., waste shipment to and from the MWSF, inspections, etc.) and audits of inspection records and waste management documents.

H.6 Job Title/Job Description

Job positions relating to MWSF operations are described below. Figure H-1, Puget Sound Naval Shipyards & Intermediate Maintenance Facility Mixed Waste Management Organizational Chart, shows the command structure for mixed waste operations at PSNS & IMF.

   a. Job description: Personnel assigned to operate the MWSF and those assigned to supervise MWSF operations.
   b. Duties: Carry out day-to-day MWSF operations, perform MWSF inspections, maintain emergency equipment, prepare and maintain the MWSF operating record, load and unload waste, and initiate MWSF spill response actions, including initiation of the Contingency Plan, all in accordance with established procedures.
   c. Skills: Ability to follow technical instructions and specifications, ability to use and maintain tools and equipment, and ability to lift and handle heavy objects.
   d. Education: Personnel are required to complete coursework in Mixed Waste Storage Facility Operations training.

   a. Job description: Personnel assigned to provide procedures for MWSF operations, waste acceptance and shipment, and records retention, and those assigned as subject matter expert supervisors.
   b. Duties: Author procedures, perform waste analyses, authorize mixed waste for storage, prepare and maintain records, provide regulatory support, prepare notifications and regulatory reports, and prepare paperwork for off-site shipment and treatment/disposal.
   c. Skills: Proficiency with computers, demonstrated competency in oral and written communication, ability to interpret and apply regulations.
   e. Other qualifications: Successful completion of a college degree or equivalent experience.
3. **Mixed Waste Emergency Coordinators.**


   b. Duties: Implement Addendum G, “Contingency Plan,” and ensure familiarity with the contingency plan, operations and activities at the facility, the location and characteristics of waste handled at the facility, the location of records for the facility, the layout of the facility, the procedures for committing the resources needed to carry out the contingency plans for the facilities, and requirements for emergency notifications.

   c. Skills: Demonstrated competency in oral and written communication and ability to interpret and apply regulations.

   d. Education: Personnel are required to complete coursework in Mixed Waste Emergency Coordinator training.

4. **Mixed Waste Storage Facility Operations Instructors.**


   b. Duties: Instruct personnel in applicable mixed waste topics in Table H-3; develop training devices and evaluation tools; and prepare learning objectives, lesson plans, and training materials.

   c. Skills: Demonstrated competency in oral and written communication and proficiency with computers.

   d. Education: Instructors are required to have completed coursework for the subjects they teach and have a good command of the subject matter.

   e. Other qualifications: Demonstrated and competent instructional skills.

5. **Characterization, Waste Analysis Plan, and Recordkeeping Instructors.**


   b. Duties: Instruct personnel in applicable mixed waste topics in Table H-3; develop training devices and evaluation tools; and prepare learning objectives, lesson plans, and training materials.

   c. Skills: Demonstrated competency in oral and written communication and proficiency with computers.

   d. Education: Instructors are required to have completed coursework for the subjects they teach and have a good command of the subject matter.

   e. Other qualifications: None required.

6. **Mixed Waste Emergency Coordinator Instructors**


   b. Duties: Instruct personnel in applicable mixed waste topics in Table H-3; develop training devices and evaluation tools; and prepare learning objectives, lesson plans, and training materials.

   c. Skills: Demonstrated competency in oral and written communication and proficiency with computers.

   d. Education: Instructors are required to have completed coursework for the subjects they teach and have a good command of the subject matter.

   e. Other qualifications: None required.
H.7 Documentation and Record Retention

The following records are maintained for the training program on-site at PSNS & IMF in a written training plan:

a. The job title for each position at the MWSF and the name(s) of the employee(s) filling each position.
b. A written position description for each position at the MWSF.
c. A written description of the type and amount of both introductory and continuing training that is given to each person filling a position at the MWSF.
d. Documentation that the employee has successfully completed all training required by the training program.

Training records for current Mixed Waste Storage Facility Operators, Mixed Waste SMEs, Mixed Waste Emergency Coordinators, and Mixed Waste Instructors are maintained until closure of the MWSF. Training records on former employees are kept for at least three years from the date the employee last worked at the facility.
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Figure H-1 Puget Sound Naval Shipyard & Intermediate Maintenance Facility
Mixed Waste Management Organizational Chart
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