

**325 HAZARDOUS WASTE TREATMENT UNITS
ADDENDUM G
PERSONNEL TRAINING
CHANGE CONTROL LOG**

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

Modification Date	Modification Number
04/26/2017	8C.2017.Q1
05/2014	

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**ADDENDUM G
PERSONNEL TRAINING**

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**ADDENDUM G
PERSONNEL TRAINING**

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1 **G PERSONNEL TRAINING**

2 This Addendum discusses personnel training requirements based on WAC 173-303 and the Hanford
3 Facility Resource Conservation and Recovery Act (RCRA) Permit, WA7890008967 (Permit). In
4 accordance with WAC 173-303-806(4)(a)(xii), the *Hanford Facility Dangerous Waste Part B Permit*
5 *Application* must contain two items: (1) *an outline of both the introductory and continuing training*
6 *programs by owners or operators to prepare persons to operate or maintain the TSD facility in a safe*
7 *manner as required to demonstrate compliance with WAC 173-303-330 and (2) a brief description of how*
8 *training will be designed to meet actual job tasks in accordance with the requirements in*
9 *WAC 173-303-330(1)(e)*. Permit Condition II.C (Personnel Training) contains training requirements
10 applicable to Hanford Facility personnel and non-Facility personnel.

11 This Addendum provides the information necessary to comply with training requirements at the
12 325 Hazardous Waste Treatment Units (HWTUs).

13 **G.1 Outline of Introductory and Continuing Training Programs**

14 The introductory and continuing training programs are designed to prepare personnel to manage and
15 maintain the Treatment, Storage, and Disposal (TSD) unit in a safe, effective, and environmentally sound
16 manner. In addition to preparing personnel to manage and maintain TSD units under normal conditions,
17 the training programs ensure that personnel are prepared to respond in a prompt and effective manner
18 should abnormal or emergency conditions occur. Emergency response training is consistent with the
19 description of actions contained in Addendum J, Contingency Plan. The introductory and continuing
20 training programs contain the following objectives:

- 21 • Teach 325 HWTUs personnel to perform their duties in a way that ensures the 325 HWTUs
22 compliance with WAC 173-303.
- 23 • Teach 325 HWTUs personnel dangerous waste management procedures (including
24 implementation of the contingency plan) relevant to the job titles/positions in which they are
25 employed.
- 26 • Ensure 325 HWTUs personnel can respond effectively to emergencies.

27 Introductory training includes general 325 HWTUs training and TSD unit-specific training. General
28 325 HWTUs training is described below, and is provided in accordance with Permit Condition II.C.2.
29 TSD unit-specific training is provided to 325 HWTUs personnel allowing those personnel to work
30 unescorted, and in some cases is required for escorted access. 325 HWTUs personnel cannot perform a
31 task for which they are not properly trained, except to gain required experience while under the direct
32 supervision of a supervisor or coworker who is properly trained. 325 HWTUs personnel must be trained
33 within 6 months after their employment at or assignment to the 325 HWTUs, or to a new job title/position
34 at the 325 HWTUs, whichever is later.

35 General Hanford Facility training

36 Permit Condition II.C.2 requires Hanford Facility personnel to receive general facility training within 6
37 months of hire. This training provides an orientation on dangerous waste management activities being
38 conducted on the 325 HWTUs and includes the following:

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

45 PNNL will provide training to all new staff that meets the requirements listed for Permit Condition II.C.2.

1 Permit Condition II.C.4, requires the Permittees to provide the necessary training to non-Facility
2 personnel (i.e., visitors, subcontractors) as appropriate for the locations and activities undertaken. At a
3 minimum, this training describes dangerous waste management hazards on the Hanford Facility. PNNL
4 will provide this training to non-Facility personnel accessing PNNL-occupied Hanford facilities.

5 Contingency Plan training

6 325 HWTUs personnel receive training on applicable portions of Permit Attachment 4, *Hanford*
7 *Emergency Management Plan* (DOE/RL-94-02) in the general 325 HWTUs training. In addition,
8 325 HWTUs personnel receive training on the content of the description of actions contained in
9 Addendum J, Contingency Plan to be able to effectively respond to emergencies.

10 Emergency Coordinator training

11 325 HWTUs personnel who perform emergency coordinator duties in WAC 173-303-360 (e.g., Building
12 Emergency Director) in the Hanford Incident Command System receive training on implementation of the
13 contingency plan and fulfilling the position within the Hanford Incident Command System. These
14 325 HWTUs personnel must also become thoroughly familiar with applicable contingency plan
15 documentation, operations, activities, location, and properties of all waste handled, location of all records,
16 and the unit/building layout.

17 Operations training

18 Dangerous waste management operations training (e.g., waste designation training, shippers training) will
19 be determined on a unit-by-unit basis and shall consider the type of waste management unit
20 (e.g., container management unit) and the type of activities performed at the waste management unit
21 (e.g., sampling). For example, training provided for management of dangerous waste in containers will
22 be different than the training provided for management of dangerous waste in a tank system. Common
23 training required for compliance within similar waste management units can be provided in general
24 training and supplemented at the TSD unit. Training provided for TSD unit-specific operations will be
25 identified in the training plan documentation based on (1) whether a general training course exists, (2) the
26 training needs to verify waste management unit compliance with WAC 173-303, and (3) training
27 commitments agreed to with Ecology.

28 **G.1.1 Continuing Training**

29 Continuing training meets the requirements for WAC 173-303-330(1)(b) and includes general Hanford
30 Facility training and TSD unit-specific training.

31 General Hanford Facility training

32 Annual refresher training is provided for general 325 HWTUs training. Refer to description in
33 Section G.1.

34 Contingency Plan training

35 Annual refresher training is provided for contingency plan training. Refer to description above in
36 Section G.1.

37 Emergency Coordinator training

38 Annual refresher training is provided for emergency coordinator training. Refer to description above in
39 Section G.1.

40 Operations training

41 Refresher training occurs on many frequencies (i.e., annual, every other year, and every 3 years) for
42 operations training. When justified, some training will not contain a refresher course and will be
43 identified as a one-time only training course. This training plan specifies the frequency for each training
44 course. Refer to description above in Section G.1.

1 **G.2 Description of Training Design**

2 Proper design of a training program verifies that personnel who perform duties on the 325 HWTUs
3 related to WAC 173-303-330(1)(e) are trained to perform their duties in compliance with WAC 173-303.
4 Actual job tasks, referred to as duties, are used to determine training requirements. The first step taken to
5 verify that 325 HWTUs personnel have received the proper training is to determine and document the
6 waste management duties by job title/position. The second step compares waste management duties to
7 the general waste management unit training curriculum. If the general waste management unit training
8 curriculum does not address the waste management duties, the training curriculum is supplemented and/or
9 on-the-job training is provided. The third step summarizes the content of a training course necessary to
10 verify that the training provided to each job title/position addresses associated waste management duties.
11 The last step is to assign training curriculum to 325 HWTUs personnel based on the previous evaluation.
12 The training plan documentation contains this process.

13 Waste management duties include those specified in Section G.1 as well as those contained in
14 WAC 173-303-330(1)(e). Training elements of WAC 173-303-330(1)(e) applicable to the 325 HWTUs
15 operations include the following:

- 16 • Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment.
- 17 • Communications or alarm systems.
- 18 • Response to fires or explosions.
- 19 • Shutdown of operations.

20 325 HWTUs personnel who perform these duties receive training pertaining to their duties. The training
21 plan documentation described in Section G.3 contains specific information regarding the types of training
22 325 HWTUs personnel receive based on the outline in Section G.1.

23 **G.3 Description of Training Plan**

24 In accordance with Permit Condition II.C.3, the 325 HWTUs chapter of the *Hanford Facility Dangerous*
25 *Waste Permit* must contain a description of the training plan. The training plan documentation is
26 maintained outside of the *Hanford Facility Dangerous Waste Part B Permit Application* and the Permit.
27 Therefore, changes made to the training plan documentation are not subject to the Permit modification
28 process. However, the training plan documentation is prepared to comply with WAC 173-303-330(2).

29 Documentation prepared to meet the training plan consists of hard copy and/or electronic media as
30 provided by Permit Condition II.C.1. The training plan documentation consists of one or more
31 documents and/or a training database with all the components identified in the core document.

32 A description of how training plan documentation meets the three items in WAC 173-303-330(2) is as
33 follows:

- 34 1. WAC 173-303-330(2)(a): *The job title, job description, and name of the employee filling each*
35 *job. The job description must include requisite skills, education, other qualifications, and duties*
36 *for each position.*

37 **Description:** The specific 325 HWTUs personnel job title/position is correlated to the waste
38 management duties. Waste management duties relating to WAC 173-303 are correlated to
39 training courses to verify that training is properly assigned.

40 Only names of 325 HWTUs personnel who carry out job duties relating to TSD unit waste
41 management operations at the 325 HWTUs are maintained. Names are maintained within the
42 training plan documentation. A list of 325 HWTUs personnel assigned to the 325 HWTUs is
43 available upon request.

44 Information on requisite skills, education, and other qualifications for job title/positions are
45 addressed by providing a reference where this information is maintained (e.g., human resources).

1 Specific information concerning job title, requisite skills, education, and other qualifications for
2 personnel is found in the training plan documentation and can be provided upon request.

- 3 2. WAC 173-303-330(2)(b): *A written description of the type and amount of both introductory and*
4 *continuing training required for each position.*

5 **Description:** In addition to the outline provided in Section G.1, training courses developed to
6 comply with the introductory and continuing training programs are identified and described in the
7 training plan documentation. The type and amount of introductory and continuing training is
8 specified in the training plan documentation as shown in Table G.1.

- 9 3. WAC 173-303-330(2)(c): *Records documenting that personnel have received and completed the*
10 *training required by this section. The Department may require, on a case-by-case basis, that*
11 *training records include employee initials or signature to verify that training was received.*

12 **Description:** As specified in Permit Condition II.C.1, PNNL will maintain documentation in
13 accordance with WAC 173-303-330(2) and (3). Training records may be maintained in hard
14 copy form or by using electronic data storage. At a minimum, training records will consist of
15 course attendance rosters correlating the training received with the personnel who were in
16 attendance. Training records are maintained in accordance with the requirements of the *Privacy*
17 *Act of 1974*. Training records for personnel are available for inspection purposes through
18 59 FR 17091, which gives federal, state, and local government officers 'routine use' access to
19 training records where a regulatory program being implemented is applicable to a U.S.
20 Department of Energy (DOE) or contractor program.

21 **Table G.1. 325 HWTUs Training Matrix**

Description of Training Course ¹	Training Category ²	Retrain Frequency ³	Staff Position		
			Waste Operations Manager	Waste Operations Staff	Hot Cell Operations Staff
Safety and Health Training	GHFT	Annual	X	X	X
Building Emergency Procedure	CPT	Annual	X	X	X
Building Emergency Director Training	ECT	Annual	X ⁴	X ⁴	X ⁴
Advanced Waste Management Training	OT	Annual	X	X	X
Container Management	OT	When Revised ⁵	X	X	X
Tank System Management	OT	When Revised ⁵	X	X	X

¹Refer to the 325 HWTUs Training Plan for a complete description of coursework in each training category.

²GHFT – General Hanford Facility Training; CPT – Contingency Plan Training; ECT – Emergency Coordinator Training; OT – Operations Training. See Section G.1.1 for description of these categories.

³ All courses required initially with refreshers administered as noted in this column.

⁴ Limited to unit staff assigned these duties.

⁵ Reading Assignment: Staff re-read the procedure(s) included in this category whenever they are revised (including minor revisions).