

Date Received: 10/20/93	INFORMATION RELEASE REQUEST	Reference: WHC-CM-3-4
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<input type="checkbox"/> Speech or Presentation	(Check only one suffix)	List attachments. Training Plan for the 1177 Facility
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Information conforms to all applicable requirements. The above information is certified to be correct.

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Lead Author	Phone 6-7776	MSIN H6-30	Other Author(s) or Requestor Steve A. Szendre		
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- Project or program manager concurs with the issuance of this report.
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- If a journal article, the reference style agrees with guidance from the client or journal publisher.
- Contributions from authors of other organizations indicated in the comment section of this form.
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- Document reports or reflects quality technical work.
- Scientific methodology used is logical and reasonable.
- Inferences and conclusions are soundly based.

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90-DAY ACCUMULATION AREA
DANGEROUS WASTE TRAINING PLAN
FOR THE 1177 FACILITY

1.0 Introduction

In accordance with Washington Administrative Code (WAC), Chapter 173-303, "Dangerous Waste Regulations," a written training plan is required for a 90-day accumulation area. WAC 173-303-200, "Accumulating Dangerous Waste on-site" requires compliance with WAC 173-303-330, Personnel Training. This training plan complies with WAC 173-303-330. This training plan, including the names of personnel in Attachment A, may be given to a regulatory agency inspector upon request provided that this plan is cleared for public release. Training records associated with personnel identified in this plan are not to be given to an outside regulatory agency inspector unless prior approval by the specific individual is obtained. Training record requests by regulatory agency inspectors without the individual's approval are to be processed via a Freedom of Information Act request through the U.S Department of Energy-Richland Field Office.

2.0 Training Program

A dangerous or mixed waste generator shall provide personnel training as directed by WAC 173-303-330. WHC Site Training is responsible for developing the program of classroom instruction. Facility managers are responsible for developing a program for facility specific training at their facility which supplements the classroom program. General requirements of a training program include:

- a. Teaching personnel to perform duties in compliance with the Dangerous Waste Regulations.
- b. Instruction by a person knowledgeable of dangerous waste management procedures and include training relevant to the employees position.
- c. A Facility Specific program that includes instruction to familiarize personnel with applicable procedures (Inspection Plans, operating procedures, etc), container management practices, spill response, and emergency procedures. Facility Specific Training must be given annually to personnel involved in operations of the 90-day accumulation area. An annual review of the Building Emergency Plan/Contingency Plan will satisfy the spill response and emergency procedures review. These requirements will be met in the following:

WEEKLY INSPECTION PROCEDURE: MAC-10, 1177 BUILDING LESS THAN 90-DAY NON-RADIOACTIVE HAZARDOUS WASTE STORAGE FACILITY INSPECTION PROCEDURE

BUILDING EMERGENCY PLAN: WHC-IP-0603-1171 BUILDING EMERGENCY PLAN.

(Items i through vi in Appendix G, section 2.0 (c) shall be included in the Building Emergency Plan.)

- d. New employees must receive training within 6 months of employment and must be supervised until completion of training.
- e. Employees must participate in an annual review of training.

3.0 Training Plan Content Requirements

According to WAC 173-303-330(2) a training plan must contain:

- 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.
- b. A written description of the type and amount of both introductory and continuing training required for each position.
- c. Records documenting that facility personnel have received and completed the training required by this section.

This information is provided or referenced in this Training Plan for all personnel involved with less than 90-day accumulation area management.

3.1 Job Title, Job Description, and Names of Employees

Appendix A of this Training Plan contains the employee names, and job title which are associated with dangerous waste management at the 90 day accumulation area. The job description contains four elements. One of which is contained in this Training Plan and the other three maintained by WHC Human Resources. WHC Human Resources maintains the requisite skills, education, and other qualifications associated with the employees position. Job titles and duties of employees associated with dangerous waste management at 90-day accumulation areas are listed below:

3.1.1 90-day Accumulation area Facility Manager. Responsibilities and duties include:

- Operating and maintaining the 90-day accumulation area in compliance with U.S. Department of Energy directives, applicable policies and procedures, and local, state, and federal regulations
- Complying with all dangerous waste policies, procedures, and regulations

- Recruiting and developing trained managers, professionals, nonexempt, and bargaining unit employees
- Ensuring safe and disciplined operations by trained personnel who implement policies and procedures
- Providing operational requirements for support organizations to plan and provide services and resources as applicable
- Promoting safe operations at the 90 day accumulation area
- Ensuring that 90-day accumulation area operating procedures are developed, reviewed, approved, and revised as applicable
- Responding to offnormal and/or emergency conditions according to established procedures
- Serving as the designated alternate to the building emergency director as applicable
- Performing the duties of the building emergency director, and understanding the impact of implementing the Contingency Plan for the 90-day accumulation area during emergencies.

3.1.2 90-day Accumulation Area Environmental Compliance Officer (ECO).
Responsibilities and duties include:

- Overviewing 90-day accumulation area environmental issues
- Assessing dangerous waste handling problem areas and implementing timely actions
- Ensuring that 90-day accumulation area management is in compliance with dangerous waste regulations
- Ensuring adherence to the EPA and Ecology reporting requirements
- Serving as the single point of contact for environmental and dangerous waste related matters
- Coordinating the review and submittal of environmental data for the following:
 - Annual dangerous waste report
 - Waste minimization report
 - Waste volume projections (solid and liquid)
 - Emergency Planning and Community Right to Know act reporting
- Preparing and providing input for reporting the following:
 - Spill information
 - Ecology and EPA reporting requirements
- Conduct periodic surveillances and/or self assessments of 90-day accumulation area operations

- Ensuring that applicable 90-day accumulation area procedures and plans are in an up-to-date condition
- Resolving regulatory interpretations required to operate a 90-day accumulation area through interfacing with the applicable environmental organizations, DOE-RL, Ecology, EPA, and applicable health departments
- Resolving dangerous waste handling, packaging, and shipping issues as applicable
- Approving dangerous waste container control as applicable
- Ensuring that a tracking system and Regulatory File for dangerous waste are maintained.

3.1.3 Hazardous Material Specialist

This position is responsible for providing direction for the proper procurement, handling, storage, transportation, and disposal of hazardous materials. Assure hazardous materials are identified, controlled, handled and disposed of in accordance with WHC policies and procedures, meeting all DOE orders, and State and Federal regulations.

3.1.4 Lube and Tire Man

Perform lubrications, oil changes, fuel vehicles, clean vehicles, and conduct visual maintenance safety inspections while lubricating on trucks, buses, sedans, and other designated equipment. Change, repair, and vulcanize tires on all Hanford mobile equipment including large construction equipment where feasible. Drive and road test all equipment and possess the Commercial Drivers License. Perform written documentation to support all assigned tasks.

Receive, inventory, maintain and document fuel, lubricant, antifreeze, solvent, and other assigned inventories as directed by management. Transport materials with a fork lift or assigned vehicle as required to support the Hanford fleet. Assist shop supervisor and Hazardous Waste Coordinators in handling, movement, and clean up of hazardous materials. Perform general shop clean up as required.

3.2 Written Description of the Type and Amount of Training

3.2.1 Employees Dangerous Waste Work Category Classifications

The 90-day accumulation area employees, including support organizations employees, are classified into one of four categories with respect to their job titles, positions, and responsibilities or involvement with dangerous waste management.

The four categories of workers are as follows:

1. All employees and unescorted contract personnel (e.g., visitors, subcontractor personnel, administrative, clerical).

2. General worker, any employee who handles, generates, packages, stores, or ships hazardous materials/waste or directly affects the management of dangerous waste (e.g., visitors, contract and subcontractor personnel, maintenance shops, fabrication shops, warehouse, paint shop).
3. General supervisor/manager, any supervisor/manager who has employees that qualify as general works (category 2).
4. General nonradiological shipper, any employees who qualify under category 2, general worker, and/or prepare and sign a uniform hazardous waste manifest (e.g., laboratory waste shipper, garage waste shipper).

3.2.2 Training Requirements

The following courses, arranged according to the four categories and an additional fifth category titled, "Additional training requirements", implement the classroom and facility specific program requirements for dangerous waste management. After personnel are categorized, the training courses must be evaluated for applicability. Please note that only the initial training course title is listed, even though the requalification training course title may differ.

Specific course numbers are maintained by Training Records. The Training Records Course Catalog is available on HLAN under Hanford Information.

1. All Employees:

- a. Hazard Communication (Haz Com) orientation--one time only. It is presented to new employees during the New Employee Safety *Adok* Orientation (NESO) training program. It is also available through Hanford General Employee Training (HGET). Employees current in Generator Hazards Safety Training are not required to take Haz Comm Orientation.
- b. Asbestos Awareness Program. Training will be provided as in Section 3.2.2(1)(a) above.
- c. Waste minimization/pollution prevention awareness. Training will be provided as in Section 3.2.2(1)(a) above.

2. General Workers:

- a. Personnel who work with hazardous materials and/or dangerous wastes. Required training:
 - (1) Generator Hazards Safety Training--every 2 years.

- (2) Facility Specific Training through the Facility Emergency and Hazard Information Checklist--annually.
 - (3) Job Specific Training as determined by management.
 - b. Hazmat employee. Required Training: See WHC-CM-2-14 to determine if existing courses can qualify to meet this requirement.
 - c. Personnel who transport, receive, store, handle, distribute, and use carcinogens. Required training:
 - (1) Generator Hazards Safety Training--every 2 years.
 - (2) Hazard Communication Facility Specific Training--annually. (See WHC-CM-4-40, section 2.1)
3. General supervisor/manager:
- a. Personnel who have decision-making authority in emergencies involving dangerous waste at 90-day accumulation areas. This refers specifically to the Building Emergency Director (BED) or Building Warden and his/her alternates; however, the training requirement may be expanded to include others within the workplace. Required Training:
 - (1) Generator Hazards Safety Training--every 2 years.
 - (2) Building Emergency Director Training or Building Warden Training--annually.
 - (3) Review of Building Emergency Plan/Contingency Plan--annually.
 - b. Personnel who are first-line supervisors or line management at 90-day accumulation areas, or who have decision-making capabilities in planning, scheduling, developing policy, writing procedures, giving verbal instructions, or overseeing jobs which affect compliance with environmental regulations. Required training:
 - (1) Generator Hazards Safety Training--every 2 years.
 - (2) Hazard Evaluation Workshop - as required to develop Facility Specific Training programs in Hazard Communication (and in the future, Waste Management).
 - (3) Environmental Regulations and Compliance Course, Phase II--annually. Required training is to be developed by the Site Training group.

4. General shippers:

a. Hazardous material shippers. Required training:

- (1) Generator Hazards Safety Training--every 2 years.
- (2) Hazardous Materials Shipment Training--every 2 years, or Hazardous Waste Shipment Certification Training--annually, if shipments are nonradioactive.

b. Dangerous waste shippers. Required training:

- (1) Generator Hazards Safety Training--one time only, while maintaining shipper and/or transporter qualification.
- (2) Hazardous Waste Shipment Certification Training--annually.
- (3) Waste Designation Support--annually.

c. Mixed waste shippers. Required training:

- (1) Generator Hazards Safety Training--one time only, while maintaining shipper and/or transporter qualification.
- (2) Hazardous Waste Shipment Certification Training--annually.
- (3) Hazardous Materials Shipment Training--every 2 years.
- (4) Waste Designation Support--annually.

5. Additional training requirements:

a. Personnel who perform waste sampling, clean and certify sampling equipment, or prepare sampling strategies and documents. Personnel who prepare sampling strategies and documents who are not exposed to hazardous materials or dangerous waste do not require training in item (1) below. Required training:

- (1) Generator Hazards Safety Training--every 2 years.
- (2) Facility Waste Sampling and Analysis--annually, or one time only if management determines that job-related experience allows personnel to adequately perform his/her duties without annual retraining.

b. Personnel who maintain inventory records of hazardous materials and report toxic chemical releases on EPCRA 312 and 313 materials. Required training:

- (1) EPCRA Reporting Requirements (Sections 312 and 313)--annually.

- (2) EPCRA 313 Toxic Chemical Release Reporting--annually.
- (3) Hazardous Material Inventory Database--annually.
- c. Personnel who handle PCBs and clean up PCB spills. Required training to be developed by the Site Training group.

3.3 Records Documenting That Training Has Been Completed

In accordance with WAC 173-303-330(3), official training records for each employee must be kept for at least 3 years from the date the employee last worked at the facility. Training records for current employees must be kept until closure of the facility. Facility Specific and Job specific training records for the 1177 90-day accumulation area are located in the 1171 Building, room 44, 1100 Area.

- a. WHC Site Training classroom instruction - Following course completion, WHC Site Training will send the training records to the Training Records group in accordance with WHC-CM-2-15.
- b. Facility Specific Training - Following course completion, management will send the training records to the Training Records group if a course number has been assigned.
- c. Job Specific Training - This training, because of the variability in course contents, cannot have a course number assigned and the are kept in the location identified above.

3.4 Updating of the Training Plan

When new courses become available, the Training Plan will be revised. When personnel change in 90-day accumulation area operations, Appendix A to this Training Plan will be updated.

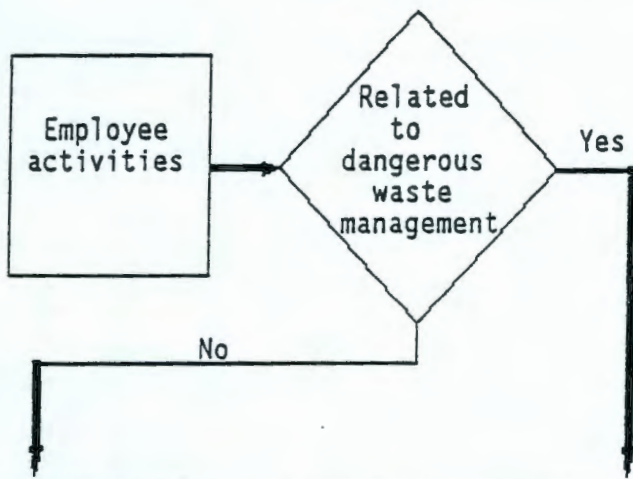
Attachment A

Names and Job Titles of Personnel
Associated with the 1177 facility
90-day Accumulation Area

<u>Name</u>	<u>Job Title</u>	<u>Worker Category</u>
R. A. Evanoff	Building Emergency Director	3
A. D. Poor	Manager, Environmental Support	3
D. E. Stocker	Hazardous Material Specialist	4
E. L. Lamm	Hazardous Material Specialist	4
R. W. France	Hazardous Material Specialist	4
S. S. Young	Lube and Tireman	2

Attachment B

Worker Category Decision Flow Diagram



Category	Definition/Example	Category	Definition/Example
1	All employees All employees and unescorted contract personnel (e.g., visitors, subcontractor personnel, administrative, clerical).	2	General worker Any employee who handles, generates, packages, stores, or ships hazardous materials/waste or directly affects the management of dangerous waste (e.g., visitors, contract and subcontractor personnel, maintenance shops, fabrication shops, warehouse, paint shops).
		3	General supervisor/manager Supervisor/manager who has employees that qualify as general workers (category 2).
		4	General nonradiological shipper Employees who qualify under category 2, general worker, and/or prepare and sign a uniform hazardous waste manifest (e.g., laboratory waste shipper, garage waste shipper).

Attachment C

Training Implementation Matrix
for Personnel at the
_____ 90-day Accumulation Area

Employee Name

Course							
Haz. Comm Orientation							
Generator Hazard Safety Training							
Facility Specific Training ¹							
Hazmat Employee							
BED Training							
Annual Review of Contingency Plan							
Hazard Evaluation Workshop ²							
Environmental Regulations and Compliance Course ³							
Hazardous Materials Shipment Training							
Hazardous Waste Shipment Certification							
Waste Designation Support							
Facility Waste Sampling and Analysis							
EPCRA Training (3 courses)							
PCB Spill cleanup ³							

- (1) Facility Specific Training includes annual waste management, emergency preparedness and hazard communication training and can include addition facility specific training relating to carcinogens.
- (2) Only required to develop facility specific training programs, no retraining required.
- (3) To be developed