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**Standards**

**PRC-STD-TQ-40236**

**Central Plateau Risk Management Dangerous Waste Training Plan**

Revision 2, Change 1

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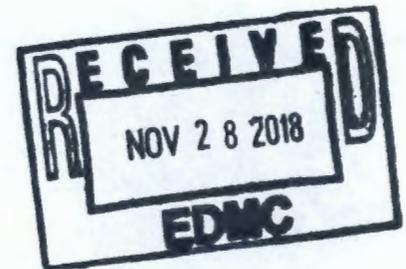
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- Central Plateau Surveillance and Maintenance :  
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## **Change Summary**

### **Description of Change**

Update as a response to Ecology Letter 18-NWP-140

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**Central Plateau Risk Management Dangerous Waste Training Plan****Published Date: 11/01/2018****Effective Date: 11/01/2018****1.0 INTRODUCTION****1.1 Purpose**

The Dangerous Waste Training Plan (DWTP) describes how the requirements of Washington Administrative Code (WAC) 173-303-330, *Personnel Training*, are met as described in Attachment 5.0 of WA7 89000 8967, *Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit*. This procedure provides instruction and guidance intended to ensure compliance with applicable environmental requirements. Proposed changes to any portion of this procedure must be reviewed by Environmental Protection. [ENV]

**1.2 Scope**

The Central Plateau Risk Management (CPRM) project manages many treatment, storage, and/or disposal (TSD) units at the Hanford Facility. CPRM manages dangerous waste in container management areas, tank systems, miscellaneous units, landfills, surface impoundments, and containment buildings. In addition, dangerous waste is managed in a  $\leq 90$ -day accumulation area(s) and satellite accumulation area(s) at CPRM. Satellite accumulation areas are not subject to WAC 173-303-330 but certain generator activities are subject to training requirements.

This DWTP addresses CPRM  $<90$ -day accumulation areas, and also addresses the following TSD units which are either included in the Hanford Facility RCRA Permit Revision 8C, or are subject to interim status standards:

- PUREX Tunnels (included in Permit)
- 400 Area Waste Management Unit (included in Permit)
- 241-CX Tank System
- Hexone Storage and Treatment Facility
- 216-A-29 Ditch
- 216-A-36B Crib
- 216-A-37-1 Crib
- 216-B-Pond/216-B-3-3 Ditch
- 216-B-63 Trench
- 216-S-10 Pond & Ditch
- Non-Radioactive Dangerous Waste Landfill
- 276-BA Interim Organic Storage Area
- 221-BB Process and Steam Condensate Building
- 221-BF Process Condensate Effluent Discharge Facility
- B Plant (tank systems, container storage, and containment building storage inside the 221-B Building)
- PUREX Tank TK-P4 (203-A Tank Farm)

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- PUREX Tank TK-40 (211-A Tank Farm)
- PUREX (tanks, and containment building storage inside the 202-A Building)
- 1301-N Liquid Disposal Facility
- 1325-N Liquid Disposal Facility

Certain generator activities are subject to training requirements based on commitments in correspondence between the U.S. Department of Energy (DOE), Richland Operations Office (RL) and the State of Washington Department of Ecology (Ecology).

The DWTP meets the requirements of PRC-PRO-TQ-459, *Environmental Training*, and WAC 173-303-330. WAC 173-303-330 requirements are described in Attachment 5.0 of WA7 89000 8967, *Hanford Facility RCRA Permit*.

In accordance with the requirements in WAC 173-303-330(2), a training plan must contain the following:

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

**1.3 Applicability**

Table 3-1 defines the applicable positions associated with this standard.

**1.4 Implementation**

This document is effective upon publication.

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### 2.0 TRAINING PROGRAM

The introductory and continuing training programs are designed to prepare personnel to manage and maintain the CPRM facilities in a safe, effective, and environmentally sound manner. In addition to preparing personnel to manage and maintain the CPRM facilities under normal conditions, the training programs ensure 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 in:

DOE/RL-98-35, *Surveillance and Maintenance Plan for the Plutonium Uranium Extraction (PUREX) Facility*.

DOE/RL-99-24, *Surveillance and Maintenance Plan for the 221-B Facility*.

HNF-IP-0263, *CP S&M, Building Emergency Plan for Balance of Site Surveillance and Maintenance*.

HNF-IP-0263, *FFTF, Building Emergency Plan for FFTF Property Protection Area*.

WA7 89000 8967, *Part III, Operating Unit 2, Addendum J, "Contingency Plan for PUREX Storage Tunnels"*.

The introductory and continuing training programs contain the following objectives:

- NOTE:**
- *Hanford Facility is a permitting term and means the Hanford Site. See [PRC-STD-TQ-40245](#), Environmental Training Program Description, which can be found at the CH2M HILL Plateau Remediation Company (CHPRC) Procedures website.*
  - Teach Hanford Facility personnel to perform their duties in a way that ensures the Hanford Facility's compliance with WAC 173-303-330, *Dangerous Waste Regulations*.
  - Teach Hanford Facility personnel dangerous waste management procedures (including implementation of the contingency plan) relevant to the job titles/positions in which they are employed.
  - Ensure Hanford Facility personnel can respond effectively to emergencies.

The introductory and continuing training programs meet requirements through general Hanford Facility training, Contingency Plan training, Emergency Coordinator training, and Operations training. Training courses designed to meet these requirements are identified in Section 3.0 and summarized in the HAMMER/Hanford Training Course Catalog.

#### Introductory Training

Introductory training includes general Hanford Facility training and TSD Unit specific training.

- General Hanford Facility training is described in WA7 89000 8967, Attachment 5.0, and provided in accordance with the Hanford Facility RCRA Permit, Condition II.C.2.

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- TSD unit and 90-day accumulation area-specific training is provided to Hanford Facility personnel allowing personnel to work unescorted, and in some cases, is required for escorted access.

Hanford Facility 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.

Hanford Facility personnel must be trained within 6 months after their employment at or assignment to the Hanford Facility, or to a new job title/position at the Hanford Facility, whichever is later. If an employee is not trained within 6 months, this employee cannot perform the duty, even if supervised.

### Continuing Training

Continuing training meets the requirements for WAC 173-303-330(1)(b) and includes general Hanford Facility training and TSD unit and 90-day accumulation area-specific training. Training courses designed to meet these requirements are identified in Section 3.0 and summarized in the training course catalog.

## **2.1 Responsibilities**

This section lists the personnel directly responsible for training at CPRM per PRC-PRO-TQ-459. This training includes the elements necessary to demonstrate compliance with WAC 173-303-330 and is made up of both classroom instruction and/or on-the-job training. Responsibilities of Hanford Facility personnel such as subcontractors and others, performing limited work in scope and duration, is defined elsewhere.

### **2.1.1 Management**

Each line manager has overall responsibility for the training of those under his/her control that includes, but is not limited to:

- Determining training requirements for personnel, subcontractors, contractors, and visitors who obtain access or work within one or more of the areas subject to this plan.
- Ensuring personnel complete required training and qualification as specified in Section 3.0 of this document.

### **2.1.2 Shift Operations Manager**

The Shift Operations Manager has the following responsibilities:

- Consults in the development and evaluation of current training programs.
- Assists in determining minimum personnel training requirements to meet compliance.
- Maintains current knowledge of training requirements pertaining to CPRM personnel.

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The Facility Manager has the following responsibilities:

- Consults in the development and evaluation of current training programs.
- Ensures employees receive environmental training commensurate with their job assignment.
- Ensures all required environmental training is completed and documented.
- Develops unit/building specific training programs to supplement the CHPRC facility-wide program.
- Ensures the RCRA training program is successfully completed by unit/building personnel:
  - (1) Within 6 months after regulations become effective.

OR

- (2) Within 6 months after their employment or assignment to the unit/building, or to a new position at the unit/building, whichever is later.
- Assigns work based on the individual's training and qualification.
  - Maintains current knowledge of RCRA training requirements pertaining to CPRM personnel.
  - Maintains employee training records and provide them if requested.

**2.1.4 Training Specialist**

The training specialist has the following responsibilities:

- Ensures that personnel are properly trained in accordance with Dangerous Waste Regulations (WAC 173-303-330) and the Hanford Facility RCRA Permit
- Ensures waste minimization concepts are included in training, as applicable
- Assists in reviewing training procedures as requested
- Supervises the preparation of training aides and materials
- Provides or schedules initial training to new personnel and continuing training as necessary

**2.1.5 Environmental Compliance Officer**

The Environment Compliance Officer has the following responsibilities:

- Consults in the development and evaluation of current training programs.
- Dangerous Waste Training Plan Technical Authority.

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### 2.2 Emergency Response Training

Federal and state regulations require that personnel be able to respond effectively to emergencies. In accordance with WAC 173-303-330(1)(e), personnel are trained on aspects applicable to operations. CPRM operations involve the management of dangerous waste within container management areas, tank systems, miscellaneous units, landfills, surface impoundments, and containment buildings. Table 2-1 indicates requirements from WAC 173-303-330(1)(e) applicable to CPRM operations.

**Table 2-1. Applicability of WAC 173-303-330(1)(e) to CPRM**

Element of WAC 173-303-330(1)(e)	Applicability to CPRM Project Container Management Areas, Tank Systems, and Containment Buildings TSD units and 90-day Accumulation Areas	Applicability to PUREX Storage Tunnels	Applicability to Landfills, Surface Impoundments and Miscellaneous Units (cribs, ponds, ditches, trenches, landfills, basins, etc.)
Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment	Yes	No	No
Key parameters for automatic waste feed cut-off systems	No	No	No
Communications or alarm systems	Yes	Yes	Yes
Response to fires or explosions	Yes	Yes	Yes
Response to groundwater contamination incidents	No	No	Yes
Shutdown of operations	No	No	No

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A list of Hanford Facility personnel assigned to the CPRM is available upon request. Personnel assigned job titles/positions that carry out job duties relating to CPRM waste management operations are identified in Table 3-1, "CPRM Project Waste Management Duty Crosswalk." Table 3-2, "CPRM Training Course Matrix," lists training courses assigned to those job titles/positions identified in Table 3-1.

Non-CPRM Personnel or Visitors include individuals not permanently assigned exclusively to the CPRM facility and who do not have dangerous waste management or generation responsibilities or supervision of such activities. These individuals include but are not limited to administrative personnel (e.g., Environmental Records), regulatory oversight, transient sampling personnel not permanently assigned to the CPRM facility, and personnel utilized for temporary assignments. Training requirements for Samplers are described in SGRP-STD-TQ-54227, "Groundwater Well Sampling, Inspection, and Maintenance Dangerous Waste Training Plan."

The job description includes requisite skills, education, other qualifications, and duties for each job title/position. The CHPRC Human Resources Department maintains information on requisite skills, education, and other qualifications for job title/positions. The Hanford Worker Eligibility Tool (HSWET) is available to demonstrate dangerous waste worker training qualification status. Specific information concerning job title/position, requisite skills, education, and other qualifications for personnel can be provided upon request.

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The following job titles/positions are assigned to personnel:

**Table 3-1. CPRM Waste Management Duty Crosswalk**

Job Title/Position	Waste Management Duty
Building Emergency Director (BED)*	<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 [Element of WAC 173-303-330(1)(e), Table 2-1]</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>
D&D Workers performing D4 on RCRA Authorized Facilities	<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> </ul>
Environmental Compliance Officer (ECO)	<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>
Field Work Supervisor (FWS)	<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 [Element of WAC 173-303-330(1)(e), Table 2-1]</li> <li>• Respond to and use communications or alarm systems [Element of WAC 173-303-330(1)(e), Table 2-1]</li> <li>• Respond to fires or explosions [Element of WAC 173-303-330(1)(e), Table 2-1]</li> <li>• Manage transfer and shipment of dangerous or mixed waste</li> <li>• Prepare and submit environmental records</li> </ul>

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Job Title/Position	Waste Management Duty
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>• Generate and handle dangerous or mixed waste during work activities</li> <li>• Prepare and submit environmental records</li> </ul>
Non-CPRM Personnel or Visitors	<ul style="list-style-type: none"> <li>• Report discovered spills and releases</li> <li>• Evacuate or take cover in response to specific incidents</li> </ul>
Nuclear Chemical Operator (NCO)	<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 dangerous or mixed waste and place waste into pre-approved containers</li> <li>• Use emergency and monitoring equipment [Element of WAC 173-303-330(1)(e), Table 2-1]</li> <li>• Respond to and use communications or alarm systems [Element of WAC 173-303-330(1)(e), Table 2-1]</li> <li>• Respond to fires or explosions [Element of WAC 173-303-330(1)(e), Table 2-1]</li> <li>• Receive a transfer or shipment of dangerous or mixed waste</li> <li>• Perform TSD unit inspections for areas subject to spills</li> <li>• Apply container markings or labels</li> <li>• Perform inspections on dangerous or mixed waste containers and areas and notify operations management of problems encountered during inspections</li> <li>• Prepare and submit environmental records</li> </ul>

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Job Title/Position	Waste Management Duty
Radiological Control Technician (RCT)	<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>• Handle dangerous or mixed waste during work activities</li> <li>• Use emergency [and monitoring] equipment [Element of WAC 173-303-330(1)(e), Table 2-1]</li> <li>• Respond to and use communications or systems [Element of WAC 173-303-330(1)(e), Table 2-1]</li> <li>• Respond to fires or explosions [Element of WAC 173-303-330(1)(e), Table 2-1]</li> <li>• Prepare and submit environmental records</li> </ul>
Single Point of Contact (SPOC)	<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>• Report spills and releases to off-site agencies</li> <li>• Environmental notification reporting</li> <li>• Prepare and submit environmental records</li> </ul>
Waste Management Representatives (WMR)	<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>• Choose containers for accumulation/storage, determine container markings, determine waste segregation practices</li> <li>• Complete waste designations</li> <li>• Initiate process for waste shipments to TSDs for storage or disposal</li> <li>• Prepare and submit environmental records</li> </ul>
Waste Shippers	<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 certify waste shipment documentation for both onsite and off-site shipments of dangerous and/or mixed waste</li> <li>• Prepare and submit environmental records</li> </ul>

\* Building Emergency Directors are, assigned CPRM personnel that have taken the BED training.  
TSD = treatment, storage, and/or disposal.

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Table 3-2. Training Course Matrix

Course Number	Course Title	Frequency	Training Type <sup>a</sup>	Job Title/Position Description										
				Non-CPRM Facility Personnel or Visitors	Maintenance Craft	Waste Shipper	SPOC	FWS	WMR	RCT	NCO	ECO	BED	D&D Workers
<b>General Training</b>														
000006	CHPRC General Employee Training (CBT)	Annual	GHFT, CPT	X <sup>c</sup>	X	X	X	X	X	X	X	X	X	X
100090	Hanford Site Visitor Orientation (CBT)	Annual	GHFT	X <sup>c</sup>										
100099	Hanford Site Orientation (CBT)	Annual	GHFT	X <sup>c</sup>										
<b>Facility Health and Safety</b>														
290200 <sup>b</sup>	CPRM Orientation and FEHIC (CBT)	Annual	GHFT, CPT	X	X	X	X	X	X	X	X	X	X	X
<b>Building Emergency</b>														
02028B	Building Emergency Director Initial Training (Classroom)	Initial	ECT										X	
037515	Building Emergency Director Refresher Training (CBT)	Annual	ECT										X	
304451	CPRM Building Emergency Director (BED) Qualification Card Checklist (OJT)	Initial	ECT										X	
<b>ECO Training</b>														
600100	Environmental Compliance Officer Core (OJT)	Initial	OT									X		

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Course Number	Course Title	Frequency	Training Type <sup>a</sup>	Job Title/Position Description										
				Non-CPRM Facility Personnel or Visitors	Maintenance Craft	Waste Shipper	SPOC	FWS	WMR	RCT	NCO	ECO	BED	D&D Workers
<b>Waste Operations</b>														
02006G	Waste Management Awareness (Classroom)	Initial	OT		X	X			X					X
020078	Advanced Mixed Waste Shipper Certification Training (Classroom)	Every 3 Years	OT			X								
020159	Advanced Hazardous Waste Shipper Certification Training (Classroom)	Every 3 Years	OT			X								
035010	Waste Designation (Classroom)	Initial	OT						X					
035012	Waste Designation Qualification (Classroom)	Annual	OT						X					
035100	Container Management Initial (Classroom)	Initial	OT		X	X			X		X			X
035110	Container Waste Management Refresher (CBT)	Annual	OT		X	X			X		X			X
153020	Waste Fundamentals Qualification Card (OJT)	Initial	OT						X					
153021	Waste Management Representative (WMR) Qualification Card (OJT)	Initial	OT						X					
290004	CPRM NCO Waste Handler Qualification	Every 2 Years	OT								X			

<sup>a</sup> Training Types in Attachment 5 of WA7890008967, Hanford Facility RCRA Permit.

<sup>b</sup> Escorted personnel do not require training in 290200

<sup>c</sup> Non-CPRM Facility Personnel or Visitors may take course number 000006, 100090, or 100099.

BED	= Building Emergency Director	GHFT	= General Hanford Facility Training
CBT	= Computer Based Training	NCO	= Nuclear Chemical Operator
CPT	= Contingency Plan Training	OJT	= On-the-Job Training
ECO	= Environmental Compliance Officer	OT	= Operations Training
ECT	= Emergency Coordinator Training	RCT	= Radiological Control Technician
FWS	= Field Work Supervisor	SPOC	= Single Point of Contact

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Training records, as described in WAC 173-303-330, consist of documentation that shows training has been completed for both classroom and on-the-job training. Training records associated with personnel identified in the DWTP are maintained in electronic format and/or hard copy.

Training records contain the course number, course title, and date of completion. In accordance with Hanford Facility RCRA Permit Attachment 5.0, and Hanford Facility RCRA Permit, Condition II.I.1, copies of training records are typically scanned, and transferred electronically to the Training Records office in Richland, Washington, where they are entered into the Integrated Document Management System (IDMS), and verified for permanent record storage. Additionally, course completion documentation of former employees that are not available in IDMS are maintained/archived at the permanent record storage center in Renton, Washington.

When a training record is requested during an inspection, an electronic record will initially be provided. Training records of former employees may not be available through computers at CPRM, and may require a representative from the Training Records office to access this information.

**5.0 FORMS**

None

**6.0 RECORD IDENTIFICATION**

None

**7.0 SOURCES****7.1 Requirements**

WA7 8000 8967, *Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit*  
WAC173-303-330, *Personnel Training*

**7.2 References**

DOE/RL-98-35, *Surveillance and Maintenance Plan for the Plutonium Uranium Extraction (PUREX) Facility*

DOE/RL-99-24, *Surveillance and Maintenance Plan for the 221-B Facility*

HNF-IP-0263-CP S&M, *Building Emergency Plan for Balance of Site Surveillance and Maintenance*

HNF-IP-0263-FFTF, *Building Emergency Plan for FFTF Property Protection Area*

PRC-PRO-EP-15333, *Environmental Protection Processes*

PRC-PRO-TQ-459, *Environmental Training*

PRC-STD-TQ-40245, *Environmental Training Program Description*

SGRP-STD-TQ-54227, *Groundwater Well Sampling, Inspection, and Maintenance*

*Supplemental to TSD Dangerous Waste Training Plans*

WAC 173-303-330, *Dangerous Waste Regulations*