



U.S. Department of Energy Hanford Site

January 6, 2021

21-AMRP-0005
REISSUE

Mr. David Bowen, Program Manager
Nuclear Waste Program
Washington State Department of Ecology
3100 Port of Benton Boulevard
Richland, Washington 99354

Dear Mr. Bowen:

REISSUE SUPPLEMENTAL INFORMATION TO THE HANFORD FACILITY RESOURCE CONSERVATION AND RECOVERY ACT PERMIT RENEWAL REVISION 9 APPLICATION FOR THE NONRADIOACTIVE DANGEROUS WASTE LANDFILL, CLOSURE UNIT GROUP 20

This letter is being reissued to include an omitted attachment. The U.S. Department of Energy, Richland Operations Office (RL) (herein after referred to as the Permittee) is transmitting the Nonradioactive Dangerous Waste Landfill, Addendum G, "Personnel Training," with Certification Statements, pursuant to the Washington Administrative Code (WAC) WAC 173-303-840(1)(b) to support the Hanford Facility Resource Conservation Recovery Act (RCRA) Permit, Revision 9, renewal. The purpose of this action is to clarify, modify, or supplement information previously submitted.

The Permittee has worked with your office on the content of Addendum G, "Personnel Training," which represents the Permittee's intent to operate pursuant to Revision 9 of the Hanford Facility RCRA Permit upon the effective date of the permit. This supplemental information may not reflect current facility configurations and/or applicable permit conditions enforceable under the Hanford Facility RCRA Permit Revisions 8C. In accordance with WAC 173-303-806(7), the Permittee will comply with the Revision 8C of the Hanford Facility RCRA Permit until the effective date of Revision 9 of the Hanford Facility RCRA Permit.

Mr. David Bowen
21-AMRP-0005
REISSUE

-2-

January 6, 2021

If you have any questions, please contact me, or your staff may contact Bill Hamel, Assistant Manager for River and Plateau, RL, on (509) 373-6727.

Sincerely,

Brian T. Vance Digitally signed by Brian T. Vance
Date: 2021.01.07 17:21:51 -08'00'

Brian T. Vance
Manager

AMRP:MK

Attachments:

1. Nonradioactive Dangerous Waste Landfill, CUG-20, Addendum G, Personnel Training
2. DOE Certification for Nonradioactive Dangerous Waste Landfill, CUG-20, Addendum G, Personnel Training
3. CHPRC Certification for Nonradioactive Dangerous Waste Landfill, CUG-20, Addendum G, Personnel Training

cc w/attachs:

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Administrative Record (TSD: D-6-1)
Ecology NWP Library
Environmental Portal
HF Operating Record (J. K. Perry, MSA)

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Nonradioactive Dangerous Waste Landfill Closure Unit Group (CUG-20), Addendum G, "Personnel Training"

Prepared for the U.S. Department of Energy
Assistant Secretary for Environmental Management

Contractor for the U.S. Department of Energy
under Contract DE-AC06-08RL14788

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Plateau Remediation Company

**P.O. Box 1600
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Nonradioactive Dangerous Waste Landfill Closure Unit Group (CUG-20), Addendum G, "Personnel Training"

Document Type: RPT Program/Project: CPRM

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Prepared for the U.S. Department of Energy
Assistant Secretary for Environmental Management

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APPROVED

By Janis D. Aardal at 9:39 am, Dec 14, 2020

Release Approval

Date

Approved for Public Release;
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**Certification
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Supporting permit application material for Nonradioactive Dangerous Waste
Landfill Closure Unit Group (CUG-20), Addendum G, “Personnel Training”**

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Brian T. Vance, Manager
Owner/Operator
U.S. Department of Energy
Richland Operations Office

Signature

Date

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L. Ty Blackford, President and CEO
Co-Operator
CHPRC
Richland, Washington

Signature

Date

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Addendum G

2

Personnel Training

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1 **G1 Introduction**

2 This addendum discusses personnel training requirements based on [WAC 173-303](#), “Dangerous Waste
3 Regulations,” and WA7890008967, *Hanford Facility Dangerous Waste Permit* (hereinafter called the
4 Permit). General training requirements are described in Permit Attachment 5, “Hanford Facility Training
5 Program.” Training requirements specific to Soil and Groundwater Project Samplers, are described in
6 Permit Attachment 8, “Inspection and Training Plan for Groundwater Monitoring Wells.”

7 The training requirements in Permit Attachment 5, Permit Attachment 8, and the unit-group specific
8 training requirements in this addendum constitute the Nonradioactive Dangerous Waste Landfill
9 (NRDWL) Training Program ([WAC 173-303-330](#)).

10 Permittees will comply with the training outlined in Table G-1, which provides the training requirements
11 for Hanford Facility personnel associated with dangerous and/or mixed waste management activities at
12 NRDWL.

13 **G1.1 Introductory and Continuing Training Program**

14 The dangerous waste training program consists of introductory and continuing training designed to
15 prepare personnel to manage and maintain the NRDWL in a safe, effective, and environmentally sound
16 manner. In addition to preparing personnel to manage and maintain the NRDWL under normal
17 conditions, the training program ensures that personnel are prepared to respond in a prompt and effective
18 manner should abnormal or emergency conditions occur. Emergency response training is consistent with
19 the description of actions contained in Addendum J, “Contingency Plan.”

20 The introductory and continuing training program contains the following objectives:

- 21 • Train personnel to perform their duties in a way that ensures compliance with the Permit.
- 22 • Train personnel dangerous waste management activities (including implementation of the
23 contingency plan) relevant to the job titles/positions in which they are employed.
- 24 • Ensure personnel can respond effectively to emergencies and abnormal conditions.

25 **G1.1.1 Introductory Training**

26 Introductory training includes general Hanford Facility training. Unit-group specific training for
27 individuals working at NRDWL includes Contingency Plan training, Emergency Coordinator training,
28 Environmental Compliance Officer training, and Operations training. General Hanford Facility training is
29 described below. Unit-group specific training is provided to NRDWL personnel allowing those personnel
30 to work unescorted, and in some cases is required for escorted access. Personnel cannot perform a task for
31 which they are not properly trained, except to gain required experience while under the direct supervision
32 of a supervisor or coworker who is properly trained as described in Section G2.1. Personnel must be
33 trained within six months after their employment at or assignment to the NRDWL, or to a new job
34 title/position at the NRDWL, whichever is later.

35 General Hanford Facility training: Personnel receive general Hanford Facility training described in Permit
36 Attachment 5, “Hanford Facility Personnel Training Program,” within six months of hire. This training
37 provides an orientation on dangerous waste management activities conducted at the Hanford Facility and
38 includes the following:

- 39 • Description of emergency signals and appropriate personnel response
- 40 • Identification of contacts for information regarding dangerous waste management activities

- 1 • Introduction to waste minimization concepts
- 2 • Identification of contact(s) for emergencies involving dangerous waste
- 3 • Familiarization with the applicable portions of Permit Attachment 4, “Hanford Emergency
- 4 Management Plan”

5 The Permittees will provide the necessary training to non-NRDWL personnel or visitors as
6 appropriate for the locations and activities undertaken. Non-NRDWL personnel or visitors include
7 individuals not permanently assigned to NRDWL and who do not have dangerous waste management
8 responsibilities or supervision of such activities. These individuals include but are not limited to
9 administrative personnel, regulatory oversight, soil and groundwater sampling personnel not
10 permanently assigned to NRDWL, and personnel utilized for temporary assignments.

11 Contingency Plan training: Personnel receive training on applicable portions of Permit Attachment 4,
12 “Hanford Emergency Management Plan.” To ensure effective emergency response, personnel also receive
13 training on the content of the actions described in Addendum J, “Contingency Plan.”

14 Emergency Coordinator training: Personnel facilitating emergency coordinator duties, [WAC 173-303-](#)
15 [360](#), “Emergencies,” such as the Building Emergency Director (BED) within the Hanford Incident
16 Command System (ICS), receive training on implementing Addendum J, “Contingency Plan,” and ICS
17 BED responsibilities. These personnel must also become thoroughly familiar with applicable contingency
18 plan documentation, operations, activities, location and properties of all waste handled, location of all
19 records, and the unit/building layout.

20 Environmental Compliance Officer training: Personnel responsible for environmental compliance receive
21 training on applicable environmental regulations, the Permit, regulator inspections and notifications,
22 preparation of environmental records, and pollution prevention practices.

23 Operations training: Dangerous waste management operations training is determined on a unit-by-unit
24 basis and considers the type of activities performed at the NRDWL (e.g., surveillance). Training provided
25 for NRDWL operations consists of position specific training.

26 **G1.1.2 Continuing Training**

27 In accordance with the requirements for [WAC 173-303-330\(1\)\(b\)](#), “Personnel Training,” dangerous waste
28 workers participate in an annual review of training, including general Hanford Facility training and unit-
29 group specific training. The frequencies for individual training courses are described below.

30 General Hanford Facility training: Annual refresher training is provided for general Hanford Facility
31 training. Refer to description in Section G1.1.1.

32 Contingency plan training: Annual refresher training is provided for contingency plan training. Refer to
33 description in Section G1.1.1.

34 Emergency coordinator training: Annual refresher training is provided for emergency coordinator training
35 including the BED training course. Refer to description in Section G1.1.1.

36 Operations training: Refresher training occurs on many frequencies (i.e., annual, every other year, and
37 every 3 years) for operations training. When justified, some training will not contain a refresher course
38 and will be identified as a one-time only training course.

39 Table G-1 specifies the frequency for each training course.

1 **G2 Description of Training Program**

2 The dangerous waste training program is overseen by a training manager who is knowledgeable in
3 dangerous waste management procedures and is otherwise qualified to design a dangerous waste training
4 program by a combination of education and relevant experience. These qualifications are listed in
5 Table G-2 as required by [WAC 173-303-330\(2\)\(a\)](#).

6 Training elements of [WAC 173-303-330\(1\)\(e\)](#) applicable to the NRDWL operations include the
7 following:

- 8 • Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment
- 9 • Communications or alarm systems
- 10 • Response to fires or explosions
- 11 • Contingency plan implementation

12 Proper design of the training program ensures personnel responsible for facilitating these elements are
13 trained to be in compliance with the Permit. Actual job tasks, referred to as duties, include the above-
14 referenced elements and are used to determine training requirements. As such, personnel receive training
15 pertinent to the duties they perform. The job duties are outlined in Table G-2 by job title/position.
16 Table G-1 contains specific training requirements for each job title/position.

17 **G2.1 Qualification of Staff (including OJT)**

18 Training consists of a combination of self-study, classroom instruction, computer-based training, and
19 on-the-job training (OJT) through use of a qualification card.

20 A qualification card is the formal mechanism used to document the specialized training and performance
21 requirements of a specific job/task. Qualification cards list the specific courses, required reading, and OJT
22 activities that must be completed in order for personnel to perform the job task independently. OJT
23 activities are performed under the supervision of personnel who have completed the OJT.

24 The trainee’s knowledge and skills are then evaluated against established standards. This can include
25 written and/or oral examinations, evaluations, and reviews to ensure that they are adequately trained
26 commensurate to their job title(s)/position(s). Results of examinations, evaluations, and reviews are
27 documented. Completed checklists, examinations and evaluations are placed in each individual’s training
28 record.

29 These qualification cards are generally required to be completed within 6 months, as a means to record
30 that personnel who perform dangerous waste activities have been provided training within 6 months of
31 employment or assignment. OJT training may, of necessity and in accordance with the provisions of the
32 collective bargaining agreements, take longer than 6 months to complete. In no case would personnel be
33 allowed to complete OJT specified tasks prior to completion of the corresponding OJT without direct
34 oversight of OJT personnel who have completed the OJT.

1 **G2.1.1 Review of the Training Program**

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

- 4 • All employees are required to complete Hanford General Employee Training (HGET) on an annual
5 basis. This training is subject to biennial evaluation by HGET Approval Authorities who review, and
6 revise HGET lessons when deemed necessary.
- 7 • The Permittee accounts for rule changes, facility changes, observed difficulties, and staff feedback to
8 incorporate changes to training curricula, and/or frequency to address such new or changing
9 circumstances.
- 10 • Another element of the training program is to ensure employees are assigned the correct training. To
11 accomplish this, annual employee training plan reviews are conducted by assigned managers.
- 12 • At the student level, the effectiveness of the training program is determined by reviewing student
13 feedback (e.g. evaluation forms) and evaluating student performance (e.g. test scores). Any changes
14 deemed necessary to the training will be addressed with a revision, and documented in the operating
15 record.
- 16 • The training matrix (Table G-1) included in this addendum indicate regularly scheduled (required)
17 refresher training frequencies of individual courses for the express purpose of ensuring a regimented
18 review of course material at a topical level on a specified interval.

19 **G3 Description of Training Plan**

20 A description of how documentation meets the three items in [WAC 173-303-330\(2\)](#) is as follows:

21 [WAC 173-303-330\(2\)\(a\)](#): *The job title, job description, and name of the employee filling each job. The*
22 *job description must include requisite skills, education, other qualifications, and duties for each position.*

23 Description: The specific personnel job title/position is correlated to the dangerous waste
24 management duties. Dangerous waste management duties relating to WAC 173-303 are correlated to
25 training courses to verify that training is properly assigned.

26 Only names of personnel who carry out duties relating to NRDWL dangerous waste management
27 activities are maintained. A list of personnel assigned to the NRDWL is available upon request.

28 A summary of requisite skills, education, and other qualifications for job title(s)/position(s) is
29 included in Table G-2. Detailed information concerning job title, requisite skills, education, and other
30 qualifications for personnel can be provided upon request.

31 [WAC 173-303-330\(2\)\(b\)](#): *A written description of the type and amount of both introductory and*
32 *continuing training required for each position.*

33 Description: In addition to the outline provided in Section G1.1, training courses developed to comply
34 with the introductory and continuing training programs are identified and described in Table G-1.
35 Certain job titles/positions identified in Table G-1 may have some variability of task
36 assignment/responsibility. Personnel assigned specific dangerous waste management duties within a
37 job title/position are only required to take the necessary training specific to those duties.

38 Note that equivalent training can be used to meet the dangerous waste training requirements outlined
39 in Table G-1. Employees can substitute courses for the required training if the course is both similar

1 in nature and quality and accomplishes the duties of the position to which he or she is assigned.
2 Personnel must show by documentation or certification that an employee's training has resulted in
3 training equivalency to the training required.

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

7 Description: As specified in Permit Condition II.C.5., the Permittees will maintain documentation in
8 accordance with [WAC 173-303-330\(2\)](#) and (3) in the Hanford Facility Operating Record, NRDWL
9 Unit Specific Portion.

10 Note that training records are maintained in accordance with the requirements of the *Privacy Act of*
11 *1974*. Training records for personnel are available for inspection purposes through 59 FR 17091,
12 which gives federal, state, and local government officers 'routine use' access to training records
13 where a regulatory program being implemented is applicable to a DOE or contractor program.

Table G-1. Personnel Training

Course Number	Course Title/Description	Frequency	Training Type ^a	Job Title/Position					
				Maintenance Craft	FWS	NCO	ECO	BED	D&D Workers
GENERAL HANFORD FACILITY TRAINING									
000001	Hanford General Employee Training (CBT) ➤ <i>Standard alarms, chemical spills, security, hazards, signs, escorts, badge requirements, and overall safety</i>	Annual	GHFT, CPT	X	X	X	X	X	X
CONTINGENCY PLAN TRAINING									
290200 ^b	CPRM Orientation and FEHIC (CBT) ➤ <i>Hazard recognition, communication/information, waste management, and emergency response</i>	Annual	GHFT, CPT	X	X	X	X	X	X
EMERGENCY COORDINATOR TRAINING									
02028B	Building Emergency Director Initial Training (Classroom) ➤ <i>BED performance expectations and responsibilities as outlined in DOE/RL-94-02 for preparation, response, and recovery from emergency events at respective facility</i>	Initial	ECT					X	
037515	Building Emergency Director Refresher Training (CBT) ➤ <i>Refresher for BED performance expectations and responsibilities as outlined in DOE/RL-94-02</i>	Annual	ECT					X	
304451	CPRM Building Emergency Director (BED) Qualification Card Checklist (OJT) ➤ <i>Emergency response actions and responsibilities of the BED specific to project CPRM facilities</i>	Initial	ECT					X	
ENVIRONMENTAL COMPLIANCE OFFICER TRAINING									
600100	Environmental Compliance Officer – Core (OJT)	Initial	OT				X		

Table G-1. Personnel Training

Course Number	Course Title/Description	Frequency	Training Type ^a	Job Title/Position					
				Maintenance Craft	FWS	NCO	ECO	BED	D&D Workers
	➤ Knowledge of environmental regulations, permits, regulator inspections and notifications, recordkeeping, and pollution prevention practices								
OPERATIONS TRAINING									
02006G	Waste Management Awareness (Classroom) ➤ Waste minimization, waste generation duties and responsibilities, notification, and recordkeeping	Initial	OT	X ^c					X
035100	Container Management Initial (Classroom) ➤ Waste minimization and pollution prevention, waste designation categories, recordkeeping, and container inspection and management	Initial	OT	X ^c	X	X			
035110	Container Waste Management Refresher (CBT) ➤ Waste minimization and pollution prevention, waste designation categories, recordkeeping, and container inspection and management	Annual	OT	X	X	X			
290004	CPRM NCO Waste Handler Qualification ➤ Waste handling, packaging, and storage	Every 2 Years	OT			X			

a. Training Types in Permit Attachment 5 of WA7890008967, Hanford Facility Dangerous Waste Permit.

b. Personnel that do not have this training will be escorted.

c. Maintenance Craft may take course 02006G or 035100 with 035110.

BED = Building Emergency Director	FWS = Field Work Supervisor
CBT = Computer Based Training	GHFT = General Hanford Facility Training
CPRM = Central Plateau Risk Management	NCO = Nuclear Chemical Operator
CPT = Contingency Plan Training	OJT = On-the-Job Training
ECO = Environmental Compliance Officer	OT = Operations Training
ECT = Emergency Coordinator Training	

Table G-2. NRDWL Job Description

Job Title/Position	Job Description	
	Duties	Requisite skills, education, other qualifications
Field Work Supervisor (FWS)	<ul style="list-style-type: none"> • Report discovered spills and releases • Evacuate or take cover in response to specific incidents • Supervise activities • Use emergency and monitoring equipment [Element of WAC 173-303-330(1)(e)] • Respond to and use communications or alarm systems [Element of WAC 173-303-330(1)(e)] • Respond to fires or explosions [Element of WAC 173-303-330(1)(e)] • Manage transfer and shipment of dangerous or mixed waste • Prepare and submit environmental records 	<p><u>Requisite skills</u> Three years of nuclear facility experience, or education/experience equivalent</p> <p><u>Education</u> High School Diploma or equivalent</p> <p><u>Other qualifications</u> None</p>
Maintenance Crafts	<ul style="list-style-type: none"> • Report discovered spills and releases • Evacuate or take cover in response to specific incidents • Generate and handle dangerous or mixed waste during work activities • Prepare and submit environmental records 	<p><u>Requisite skills</u> One year maintenance related</p> <p><u>Education</u> High school diploma or equivalent</p> <p><u>Other qualifications</u> None</p>
Nuclear Chemical Operator (NCO)	<ul style="list-style-type: none"> • Report discovered spills and releases • Conduct inspections • Respond to fires or explosions [Element of WAC 173-303-330(1)(e)] • Evacuate or take cover in response to specific incidents • Use emergency and monitoring equipment [Element of WAC 173-303-330(1)(e)] • Respond to and use communications or alarm systems [Element of WAC 173-303-330(1)(e)] 	<p><u>Requisite skills</u> None</p> <p><u>Education</u> High school diploma or equivalent</p> <p><u>Other qualification</u> None</p>
D&D Workers performing D4 on RCRA Authorized Facilities	<ul style="list-style-type: none"> • Report discovered spills and releases • Evacuate or take cover in response to specific incidents • Manage dangerous or mixed waste during work activities 	<p><u>Requisite skills</u> None</p> <p><u>Education</u> High school diploma or equivalent</p> <p><u>Other qualification</u> As detailed in Table G-1</p>
Environmental Compliance Officer (ECO)	<ul style="list-style-type: none"> • Report discovered spills and releases • Evacuate or take cover in response to specific incidents 	<p><u>Requisite skills</u> Experience with environmental regulations</p>

Table G-2. NRDWL Job Description

Job Title/Position	Job Description	
	Duties	Requisite skills, education, other qualifications
	<ul style="list-style-type: none"> • Ensure operations are consistent with requirements contained in Dangerous Waste Regulations, WAC 173-303 • Prepare and submit environmental records 	<u>Education</u> Bachelor of Arts or Bachelor of Science degree in a technical discipline or an equivalent combination of education and experience. <u>Other qualifications</u> None
Building Emergency Director (BED)*	<ul style="list-style-type: none"> • Report discovered spills and releases • Evacuate or take cover in response to specific incidents • Respond to and use communications or alarm systems [Element of WAC 173-303-330(1)(e)] • Provide direction during emergencies, evacuation or take cover • Perform RCRA Emergency Coordinator duties as the BED in Hanford Incident Command System • Prepare and submit environmental records 	<u>Requisite skills</u> Three years nuclear facility experience <u>Education</u> High school diploma or equivalent <u>Other qualifications</u> Field Work Supervisor qualified
Training Manager	<ul style="list-style-type: none"> • Ensure the application of a graded, systematic approach to training program development and administration • Ensure the training program will comply with WAC 173-303 • Approve training program content and provide final approval 	<u>Requisite skills</u> Four years nuclear facility experience <u>Education</u> Bachelor of Science or Bachelor of Arts <u>Other qualifications</u> None

*Building Emergency Directors are assigned CPRM project personnel that have taken BED training.

RCRA = *Resource Conservation and Recovery Act of 1976*

TSD = Treatment, Storage, and/or Disposal

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Brian T. Vance  Digitally signed by Brian T. Vance
Date: 2021.01.06 18:18:23 -08'00'

Brian T. Vance, Manager
Owner/Operator
U.S. Department of Energy
Richland Operations Office

Signature

Date

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L. Ty Blackford

L. Ty Blackford, President and CEO
Co-Operator
CHPRC
Richland, Washington



Signature

12/15/2020

Date