



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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August 24, 2023

23-NWP-105

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United States Department of Energy
PO Box 450, MSIN: H6-60
Richland, Washington 99352

Wesley H. Bryan, President
Washington River Protection Solutions
PO Box 850, MSIN: H3-21
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Re: Acceptance of the Certified Supplemental Information to the *Hanford Facility Dangerous Waste Permit for the Treatment, Storage, and Disposal of Dangerous Waste, Revision 9, WA7890008967, (Site-wide Permit, Rev 9) Renewal Application for the Single-Shell Tank System, Closure Unit Group 4 (CUG 4)*

Reference: See page 2

Dear Brian T. Vance and Wesley H. Bryan:

The Department of Ecology (Ecology) reviewed the Certified Supplemental Information provided by United States Department of Energy and Washington River Protection Solutions (Permittees) for the Single-Shell Tank System, CUG 4 (Reference).


Ecology accepts the Supplemental Information in support of the Site-wide Permit, Rev 9 renewal application and we will incorporate the content with additional changes in the draft Site-wide Permit, Rev 9. Ecology will notify the Permittees of the changes and incorporate them into the final draft files made available for public review.

Ecology worked with the Permittees on the content of Addendum G, "Personnel Training," for the Single-Shell Tank System permit. Ecology made additional changes to Addendum G because agreed-to changes were not incorporated in the certified submittal. Enclosed is a draft courtesy copy of Addendum G, "Personnel Training" with Ecology's changes.

In accordance with Washington Administrative Code 173-303-806(7), the Permittees will comply with the *Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Revision 8C, for the Treatment, Storage, and Disposal of Dangerous Waste* until the effective date of the Site-wide Permit, Rev 9.

If there are any questions, please contact Eric Pierce (Pierce), Permit Writer at (509) 410-5273 or eric.pierce@ecy.wa.gov, or Amie Green, Permit Coordinator, at (509) 316-6873 or amie.green@ecy.wa.gov.

Sincerely,

 Digitally signed
by Schleif,
Stephanie (ECY)
Stephanie Schleif
Deputy Program Manager
Nuclear Waste Program

ag/mo

Enclosure

Reference: Letter 23-ECD-000347, dated January 30, 2023, "Submittal of Supplemental Information to the Hanford Facility Resource Conservation and Recovery Act Permit Renewal (Revision 9) Application for the Liquid Effluent Retention Facility and 200 Area Effluent Treatment Facility, 242-A Evaporator, Double-Shell Tank System, and Single-Shell Tank System, Addenda G, Personnel Training"

cc electronic w/enc:

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**ADDENDUM G
PERSONNEL TRAINING**

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2 **ADDENDUM G**
3 **PERSONNEL TRAINING**

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1 **G. PERSONNEL TRAINING**

2 This Addendum discusses personnel training requirements based on *Washington Administrative Code*
3 (WAC) 173-303, “*Dangerous Waste Regulations*” and the Hanford Facility ~~RCRA~~Dangerous Waste
4 Permit, WA7890008967 (Permit). This Addendum provides the information necessary to comply with
5 training requirements associated with permitted dangerous waste management activities at the Single-
6 Shell Tank (SST) System.

7 **G.1 Introductory and Continuing Training Program**

8 The Dangerous Waste Training Program consists of introductory and continuing training programs that
9 are designed to prepare personnel to operate and/or maintain the SST System in a safe, effective, and
10 environmentally sound manner. In addition to preparing personnel to manage and maintain the SST
11 System under normal conditions, the training programs ensure that personnel are prepared to respond in a
12 prompt and effective manner should abnormal or emergency conditions occur. Emergency response
13 training is consistent with the description of actions contained in Addendum J, Contingency Plan.

14 The SST System does not satisfy the requirements of WAC 173-303; and therefore is undergoing closure.
15 Although the SST System is a Closure Unit, DOE and Ecology have agreed to provide permit addenda for
16 the SST System to incorporate ‘operation like’ activities during the extended closure period.

17 Tables G.1 and G.2 identify the type, amount, and description of both introductory and continuing
18 training relevant to positions and job duties for SST System personnel required in the Permit.
19 TFC-PLN-187, Single-Shell Tank Dangerous Waste Training Plan, identifies each job title/position and
20 requisite skills, education requirements, and other qualifications for SST System personnel. [WAC 173-
21 303-330(2)]

22 Introductory and continuing training programs have the following objectives.

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

27
28 The introductory and continuing training programs are provided through general Hanford Facility training
29 and SST System unit-group specific training as outlined below. [[WAC 173-303-330](#)]

30
31 **G.1.1 Introductory Training**

32 Introductory training includes General Hanford Facility Training and unit-group specific training for the
33 SST System. General Hanford Facility Training and unit-group specific training is described below.
34 Unit-group specific training is provided to SST System personnel which allows them to work unescorted,
35 and in some cases, is required for escorted access. Personnel will be supervised until training identified in
36 Tables G.1 and G.2 are complete and cannot perform a task for which they are not trained, except to gain
37 required experience while under instruction of a trained employee, or a professional trainer as described
38 in Section G.2.1.

39 General Hanford Facility Training: Hanford Facility personnel will receive Hanford General Employee
40 Training (HGET) described in Permit Attachment 5, “Hanford Facility Personnel Training Program.”
41 This training provides an orientation on dangerous waste management activities conducted at the Hanford
42 Facility and includes the following.

- 1 • Description of emergency signals and appropriate personnel response.
- 2 • Identification of contacts for information regarding dangerous waste management activities.
- 3 • Introduction to waste minimization concepts.
- 4 • Identification of contact(s) for emergencies involving dangerous waste.
- 5 • Familiarization with the applicable portions of the Permit Attachment 4, *Hanford Emergency*
- 6 *Management Plan*.

7 Contingency Plan Training: SST System personnel receive training on applicable portions of Permit
8 Attachment 4, *Hanford Emergency Management Plan* in HGET. To ensure effective emergency response,
9 personnel also receive training on the content of the actions described in Addendum J, “Contingency
10 Plan” as well training is described in Table G.1.

11 ~~Waste Management & Transportation training: Waste Management and Transportation training is~~
12 ~~provided to personnel if their job duties include acceptance, designation, handling, packaging, and/or~~
13 ~~shipping of dangerous waste. Waste Management and Transportation training is described in Table G.1.~~
14 ~~Personnel who perform onsite or offsite shipping duties will be trained; if onsite or offsite shipper duties~~
15 ~~are not needed, a shipper may not be assigned with facility specific training.~~

16 Emergency Coordinator training: ~~The Central Shift Manager~~ Personnel facilitating Emergency
17 Coordinator duties, ~~under~~ WAC 173-303-360, “*Emergencies*,” such as the Building Emergency Director
18 (BED) Warden (BW) within the Hanford Incident Command System (ICS); receive training on
19 implementing Addendum J, *Contingency Plan*, and ICS-BEDBW responsibilities. ~~Emergency~~
20 ~~Coordinator training is described in Table G.1.~~

21 Environmental Professional Training: Environmental Field Representative receive training on applicable
22 environmental regulations, the Permit, regulator inspections and notifications, preparation of
23 environmental records, and pollution prevention practices. ~~Environmental Professional training is~~
24 ~~described in Table G.1.~~

25 ~~Waste Management & Transportation training: Waste Management and Transportation training is~~
26 ~~provided to personnel if their job duties include acceptance, designation, handling, packaging, and/or~~
27 ~~shipping of dangerous waste. Waste Management and Transportation training is described in Table G.1.~~
28 ~~Personnel who perform onsite or offsite shipping duties will be trained; if onsite or offsite shipper duties~~
29 ~~are not needed, a shipper may not be assigned with facility specific training.~~

30 Task Specific /Facility Operations Training: ~~Facility Dangerous waste management task specific~~
31 ~~Operations training needs are~~ is determined on a unit-by-unit basis and considers the type of activities
32 performed at the SST System. ~~Facility Operations training is identified in Table G.2 of this Addendum.~~
33 Task specific Facility Operations training includes monitoring and inspecting tank systems, performing
34 waste retrieval and waste transfers, operating support systems, control room operations, waste sampling,
35 emergency response training on emergency systems, and operations management responsibilities.

36 Non-SST System Personnel or Visitors: As appropriate for the locations and activities, the Permittees
37 will ensure training to non-SST System personnel or visitors is undertaken. Non-SST System personnel
38 or visitors include individuals not permanently assigned to the SST System and who do not have
39 dangerous waste management responsibilities or supervision of such activities. These individuals include
40 but are not limited to administrative personnel, regulatory oversight, transient sampling personnel,
41 temporary personnel and other personnel not permanently assigned to the SST System. ~~Training for non-~~
42 ~~SST System personnel and visitors is described in Table G.1.~~

1 For training of Groundwater Samplers including response to groundwater contamination incidents, refer
2 to Attachment 8, Inspection and Training Plan for Groundwater Monitoring Wells, of the Permit. ~~Part IV,~~
3 ~~Corrective Action, this Permit; Part IV~~Attachment 8 is not addressed further in this Addendum.

4 **G.1.2 Continuing Training**

5 Refresher training occurs on many frequencies (i.e., annual, biennial, and triennial) for operations
6 training. When justified, some training will not contain a refresher course and will be identified as a one-
7 time-only training course. Frequency of training is identified in Tables G.1 and G.2 of this addendum.

8 **G.2 Description of Training Program**

9 The dangerous waste training program is overseen by the Dangerous Waste Training Program Director,
10 who is knowledgeable in dangerous waste management procedures and is otherwise qualified to design a
11 dangerous waste training program by a combination of education and relevant experience. The job
12 description, duties, requisite skills, minimum education, and other qualifications of SST System personnel
13 are described in the SST System Dangerous Waste Training Plan (DWTP) (TFC-PLN-187).

14 Training elements of WAC 173-303-330(1)(e), ~~Personnel Training,~~ applicable to the SST System
15 activities include the following.

- 16 • Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment.
- 17 • Communications and alarm systems.
- 18 • Response to fires or explosions.
- 19 • Shutdown of operations
- 20 • ~~including k~~Key parameters for automatic waste feed cut-off systems.

21 Proper design of the training program ensures SST System DWTP personnel will be trained to perform
22 their duties compliant with the Permit. Actual job tasks, referred to as duties, include the above-
23 referenced elements and are used to determine training requirements. As such, SST System personnel
24 receive training appropriate to the duties they perform. Tables G.1 and G.2 contain specific information
25 regarding the training requirements for SST System personnel. This enables employees to know how to
26 respond to emergencies, handle mixed/dangerous waste properly, and perform their work/duties in a safe
27 manner.

28 **G.2.1 Qualification of Personnel**

29 Qualification of facility personnel relies on a combination of required education and experience, training
30 courses (classroom and computer based), required reading, and On-The-Job Training (OJT). Training is
31 determined and assigned based on job duties described in this Addendum. Records for completion of
32 training (e.g., course roster, qualification card, OJT card, qualification checklist, required reading, etc.) is
33 retained in the Operating Record, ~~SST System portion, in accordance with Permit Attachment 6,~~
34 ~~“Recordkeeping and Reports.”~~

35 Various evaluation techniques are used to measure a trainee's satisfactory completion of training.
36 Examples of evaluation techniques are performance in written and oral exams and careful observation of
37 on-the-job performance. Periodically, employees critique formal training sessions using a training
38 evaluation form. The evaluator determines whether the trainee has mastered the skills at the competency
39 level necessary to perform the tasks described in the job description.

40 OJT is hands-on training for the job duty provided under supervision of an evaluator (e.g. trained
41 employee or professional trainer) who serves as the course instructor. OJT is assigned a course number
42 with course completion ~~roster~~ being proof of training.

1 Training to meet the Dangerous Waste Training Program requirements is required to be completed within
2 six months of assignment to dangerous waste duties at the ~~DST~~SST System, or to a new job/title position
3 at the SST System, whichever is later. While training courses (classroom and computer based) can be
4 completed within six months, OJT may take longer than six months to complete due to facility inactivity,
5 complexity of requirements, complexity of tasks being performed, and pursuant to collective bargaining
6 agreements. In no case would untrained personnel be allowed to complete job duties described in this
7 Addendum unless overseen by trained personnel.

8 **G.2.2 Review of the Training Program**

9 All employees are required to complete HGET on an annual basis. This training is subject to biennial
10 evaluation by HGET Approval Authorities who review, and revise HGET lessons when deemed
11 necessary.

12 The Permittee's Dangerous Waste Training Program is reviewed through an iterative process of
13 continuous improvement. The following information is evaluated as part of this review.

- 14 • ~~e~~Changes to the Dangerous Waste regulations-
- 15 • ~~e~~Changes to the ~~RCRA~~ Permit-
- 16 • ~~e~~Changes to procedures-
- 17 • ~~i~~ssues and opportunities for improvement identified by internal assessments-
- 18 • ~~i~~ssues or areas of noncompliance identified ~~during~~as a result of events or regulatory inspections?
- 19 • ~~d~~eficiencies in personnel performance of job tasks-
- 20 • ~~f~~eedback on training content-

21 Changes, problems, or opportunities for improvement may be addressed by revising course content,
22 retrain frequency or delivery method. Periodically, employees critique formal training sessions using a
23 training evaluation form. Each dangerous waste training course undergoes a full review at least every
24 three years even if none of the conditions above indicate the need to revise the training program. The
25 course material for the training courses listed in this Addendum are regularly reviewed at a topical level.

26 The training matrices included in this Addendum indicate regularly scheduled (required) refresher
27 training frequencies of individual courses to ensure a regimented review of course material at a topical
28 level on a specified interval.

29 Included in the review of training is an annual review of training matrices identifying changes in:

- 30 • ~~e~~Course ID numbers
- 31 • ~~e~~Course titles
- 32 • ~~m~~ethod of delivery

33 Changes to course ID numbers, course titles, or method of delivery ~~resulting during~~as a result of the
34 annual review will be submitted as permit modification request in accordance with Permit Condition
35 ~~H.C.13~~, consistent with identifying changes in the DWTP, which are not a decrease in the type or amount
36 of training given to employees.

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

38 Training Plan documentation is maintained outside of the Permit, therefore, changes made to Training
39 Plan documentation are not subject to the Permit modification process. However, Training Plan
40 documentation is prepared to comply with WAC 173-303-330(2) requirements.

41 Documentation prepared to meet the requirements of this Training Plan consists of hard copy and/or
42 electronic media. The Training Plan documentation consists of one or more documents and/or a training
43 database with all the components identified in the core document. Training Plan documentation is

1 maintained in the Operating Record, SST System portion, as required by Permit Condition II.C. A
2 description of how ~~DWTP Training Plan~~ documentation meets the three items in WAC 173-303-330(2) is
3 as follows:

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

7 Description: The specific ~~DS~~SST System personnel job title/position is correlated to the waste
8 management duties. Waste management duties relating to WAC 173-303 are correlated to training
9 courses to verify that training is properly assigned.

10 Only names of ~~DS~~SST System personnel who carry out job duties relating to dangerous waste
11 management operations at the SST System are maintained. A list of personnel assigned to the ~~DS~~SST
12 System is available upon request.

13 Detailed information concerning job title, requisite skills, education, and other qualifications for
14 personnel is included in the DWTP and is available upon request.

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

17 Description: In addition to the outline provided in Section G.1, Tables G.1 and G.2 identify the type,
18 amount, and description of both introductory and continuing training relevant to positions and job
19 duties required in the Permit for ~~DS~~SST System personnel. Certain positions may have some
20 variability of task assignment/responsibility. Personnel assigned specific waste management duties
21 within a position are only required to take the necessary training specific to that duty.

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

25 Description: The Permittees will maintain documentation for completion of training (e.g., course
26 roster, qualification card, OJT card, qualification checklist, required reading, etc.) in the Operating
27 Record, ~~DS~~SST System portion, in accordance with Permit Condition II.C. ~~45 and Permit Attachment~~
28 ~~5~~.

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

Table G.1. Personnel Training

Course Number	Course Title/Description	Frequency*	Waste Designator	Shipper On-Site	Shipper Off-Site	Environmental Field Representative	Building Emergency Director (BED)	Fire Protection Engineer	Dangrous Waste Training Program Director	Unescorted Visitors and Other Nonresident Personnel who are not Facility Residents	Escorted Visitors and Other Nonresident Personnel who are not Facility Residents
GENERAL HANFORD FACILITY TRAINING											
000001 000001	Hanford General Employee Training (HGET) (CBT) Standard alarms, chemical spills, security, hazards, signs, escorts, badge requirements, and overall safety.	Annual after initial	X	X	X	X	X	X	X	X	X
000019	Refresher										
CONTINGENCY PLAN TRAINING											
358003	TOC Facility Orientation and FEHIC (CBT) Basic operations, safety, and security, waste minimization, emergency response, hazard communications.	Annual	X	X	X	X	X			X	
TASK SPECIFIC/OPERATIONS TRAINING											
350560 or 350561	TOC Waste Handling, Segregation, and Packaging (Classroom) Waste management, waste handling, waste generation, satellite accumulation, waste clean-up. Refresher	Annual after initial	X			X					
035010	Waste Designation (Classroom) Waste designation and Land Disposal Restrictions according to WAC 173-303.	One-time only	X								
035012	Waste Designation Qualification (Qual Card) Waste designation and Land Disposal Restrictions according to WAC 173-303.	Annual	X								
351032	Waste Designator (Qual Card) Waste designation requirements.	One-Time Only	X								
351024	On-Site Shipper (Qual Card) Completion of Shipping Papers to various units.	One-time only		X							
351033 or 351034	Off-Site Shipper (Qual Card) Waste shipment requirements. Refresher	Biennial after initial			X						

Addendum G.6

Table G.1. Personnel Training

Course Number	Course Title/Description	Frequency*	Waste Designator	Shipper On-Site	Shipper Off-Site	Environmental Field Representative	Building Emergency Director (BED)	Fire Protection Engineer	Dangrous Waste Training Program Director	Unescorted Visitors and Other Nonresident Personnel who are not Facility Residents	Escorted Visitors and Other Nonresident Personnel who are not Facility Residents
020078	Advanced Mixed Waste Shipper Certification (Classroom) <u>Shipping techniques on hazardous wast labels, containers, packing, and manifesting</u>	<u>Triennial after initial</u>			X						
350883	Fire Protection Engineer (Qual. Card) Fire protection duties during ignitable/reactive waste inspections.	One-Time Only						X			
ENVIRONMENTAL PROFESSIONAL TRAINING											
352060 02	Environmental Professional Qualification (Qual Card) Knowledge of environmental regulations, permits, regulator inspections and notifications, recordkeeping, and pollution prevention practices.	Biennial after initial				X					
352061	Refresher										
EMERGENCY COORDINATOR TRAINING											
02028B 02	Building Emergency Director Initial Training (Classroom) BED performance expectations and responsibilities as outlined in DOE/RL-94-02 for preparation, response, and recovery from emergency events at respective facility.	Annual after initial					X				
037515	Refresher										
35E001 02	TOC Emergency Response Organization Initial Training (Classroom) Hierarchy of the Emergency Management documents, development of emergency action levels, operational emergencies, protective actions, responsibilities of the Emergency Coordinator within RCRA Contingency Plan.	Annual after initial					X				
35E002	Refresher										
CBT = Computer Based Training <u>BED = Building Emergency Director</u> Qual Card = Qualification Card, includes On-the-Job Training (OJT) (i.e. Performance Demonstration & Training Checklist)											

Addendum G.7

Table G.2. SST Specific Training

Course Number	Course Title/Description	Frequency*	NCO – Operations	NCO - Waste Operations.	NCO - Retrieval	NCO –Multimedia	NCO – Vadose Sampler	NCO – Field Sampling	NCO – Rotary Sampler	NCO – Push Sampler	Waste Compatibility	Stationary Operations Engineer	Shift Operations Manager/ Operations Engineer
GENERAL HANFORD FACILITY TRAINING													
000001 00 000019	Hanford General Employee Training (HGET) (CBT) Standard alarms, chemical spills, security, hazards, signs, escorts, badge requirements, and overall safety. Refresher	Annual after initial	X	X	X	X	X	X	X	X	X	X	X
CONTINGENCY PLAN TRAINING													
358003	TOC Facility Orientation and FEHIC (CBT) Basic operations, safety, and security, waste minimization, emergency response, hazard communications.	Annual	X	X	X	X	X	X	X	X		X	X
35E003	Tank Farms Emergency Response Organization for Support Personnel (CBT) Roles and responsibilities of the Emergency Response Organization, event scene mitigation and set-up, emergency response procedures, conditions that require Hanford Incident Command System, event discoverers responsibilities.	Annual	X	X	X	X	X	X	X	X			
TASK SPECIFIC OPERATIONS TRAINING													
350340 00 350342	TOC Base Operations Initial (OJT/PD) Interplant Relationships, Operational Requirements, and Emergency Response. Qualification	Biennial after initial	X	X	X	X	X	X	X	X			
350570 00 350572	Stationary Operations Engineer Qualification (OJT, PD) Operation and inspection of emergency equipment. Qualification	Biennial after initial										X	

Addendum G.8

Table G.2. SST Specific Training

Course Number	Course Title/Description	Frequency*	NCO – Operations	NCO - Waste Operations.	NCO - Retrieval	NCO –Multimedia	NCO – Vadose Sampler	NCO – Field Sampling	NCO – Rotary Sampler	NCO – Push Sampler	Waste Compatibility	Stationary Operations Engineer	Shift Operations Manager/ Operations Engineer
351602 08	Retrieval Field Equipment Operations Certification (OJT) Role of sluicing, ventilation exhauster operation, hose-in-hose transfer line, in-tank imaging system and CCTV, leak detection and leak monitoring processes, sluicing operator procedures, abnormal operation responses, alarm responses, safety basis, material balance.	Biennial after initial			X								
351603	Requalification												
350515 08	Multi-media Sampling Operations (OJT, PD) Sample packaging and shipping instructions to perform sampling for non-volatile and volatile organic compounds in soil and sediment. Sampling containers, use of temperature controlled sample storage units, use of chain of custody and certificates of analysis, use of logbooks.	Biennial after initial				X							
350516	Requalification												
351474 08	Vadose Zone Soil Sampling (OJT, PD) Special handling for vadose zone sampling.	Biennial after initial					X						
351475	Requalification												
351479 08	Field Sampling Operations Certification (OJT, PD) Tank sampling, field sampling, Tank Sampling and Analysis Plan(s) scope, precautions and limitations, off-riser sampling, grab sampling, and use of glove bags for sampling .	Biennial after initial						X					
351482	Requalification												
358300 08	Rotary Mode Operations (OJT, PD) Obtain tank waste core samples using rotary-mode drill.	Biennial after initial							X				
358301	Requalification												
350070 08	Push Mode Operations (OJT, PD) Obtain tank waste core samples using push-mode drill.	Biennial after initial								X			
350077	Requalification												

Addendum G.9

Table G.2. SST Specific Training

Course Number	Course Title/Description	Frequency*	NCO – Operations	NCO - Waste Operations.	NCO - Retrieval	NCO –Multimedia	NCO – Vadose Sampler	NCO – Field Sampling	NCO – Rotary Sampler	NCO – Push Sampler	Waste Compatibility	Stationary Operations Engineer	Shift Operations Manager/ Operations Engineer
			BED – Building Emergency Director CBT = Computer Based Training NCO = Nuclear Chemical Operator Qual Card = Qualification Card, includes On-the-Job Training (OJT) (i.e. Performance Demonstration (PD) & Training Checklist)										