

WASTE TREATMENT AND IMMOBILIZATION PLANT
CHAPTER 8.0
PERSONNEL TRAINING
CHANGE CONTROL LOG

Change Control Logs ensure that changes to this unit are performed in a methodical, controlled, coordinated, and transparent manner. Each unit addendum will have its own change control log with a modification history table. The “**Modification Number**” represents Ecology’s method for tracking the different versions of the permit. This log will serve as an up to date record of modifications and version history of the unit.

Modification History Table

Modification Date	Modification Number
<u>11/29/2017</u>	<u>8C.2017.4D</u>
09/05/2017	8C.2017.6F
06/2011	

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CHAPTER 8.0
PERSONNEL TRAINING

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CHAPTER 8.0
PERSONNEL TRAINING

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1 8.0 INTRODUCTION

2 This chapter discusses personnel training requirements based on Washington Administrative Code
3 [\(WAC\) 173-303](#) and the *Dangerous Waste Portion of the Hanford Facility Resource Conservation and*
4 *Recovery Act Permit for the Treatment, Storage, and Disposal of Dangerous Waste* (Ecology 1994a),
5 hereafter referred to as “the Permit”.

6 Permit Condition II.C (Personnel Training) contains training requirements applicable to Hanford Site
7 facility personnel and non-facility personnel. Compliance with these requirements at the Hanford Tank
8 Waste Treatment and Immobilization Plant (WTP) is demonstrated by information contained in both
9 *Permit Attachment 5* and this chapter. A training plan for the WTP will be submitted for incorporation
10 into the operating record prior to initial receipt of waste to meet interim compliance schedule item 7.

11 8.1 INITIAL TRAINING

12 Introductory training includes general Hanford Facility training and WTP-specific training. General
13 Hanford Facility training is described in Permit Attachment 5, and provided in accordance with Permit
14 Condition II.C. WTP-specific training is provided to WTP personnel allowing personnel to work
15 unescorted, and in some cases is required for escorted access. WTP personnel cannot perform a task for
16 which they are not properly trained, except to gain required experience while under the direct supervision
17 of a supervisor or coworker who is properly trained. WTP personnel will be trained within 6 months after
18 their employment at or on assignment to the WTP. If personnel are assigned to a new job title or position
19 at the WTP, any additional position-specific training will be completed within 6 months.

20 **General Hanford Facility Orientation:** Refer to description in Permit Attachment 5, Section 5.1.

21 **Contingency Plan Training:** WTP personnel receive training on applicable portions of the *Hanford*
22 *Emergency Management Plan* (DOE/RL-94-02), as amended (Permit Attachment 4) in General Hanford
23 Facility Orientation. In addition, WTP personnel receive training on the description of actions contained
24 in the contingency plan documentation in Part III, Operating Unit Group 10, Chapter 7.0 to be able to
25 effectively respond to WTP emergencies.

26 **Emergency Coordinator Training:** WTP personnel who perform emergency coordinator duties as
27 specified in [WAC 173-303-360](#) (e.g., the Building Emergency Director) in the Hanford Incident
28 Command System (ICS) receive training on implementation of the contingency plan and fulfilling the
29 position within the Hanford ICS. These WTP personnel will also become thoroughly familiar with
30 applicable contingency plan documentation, operations, activities, location, and properties of waste
31 handled, location of records, and the unit and building layout.

32 **Operations Training:** Dangerous waste management operations training (e.g., waste designation
33 training, shippers training) will be determined on a unit-by-unit basis, and will consider the type of waste
34 management unit and the type of activities performed at the waste management unit. For example,
35 training provided for management of dangerous waste in containers will be different than the training
36 provided for management of dangerous waste in a tank system. Common training required for
37 compliance within similar waste management units can be provided in general training, and supplemented
38 at the WTP. Training provided for WTP-specific operations are identified in both this chapter and will be
39 included in the WTP Dangerous Waste Training Plan. The detailed course curricula descriptions will be
40 contained in the WTP Dangerous Waste Training Plan. WTP-specific training is based on the following:

- 41 • Whether a general training course exists.
- 42 • The training needs to ensure waste management unit compliance with [WAC 173-303](#).
- 43 • Training commitments agreed to with the Washington State Department of Ecology.

1 **8.2 TASK SPECIFIC TRAINING**

2 A properly designed training program ensures that personnel who perform duties at the WTP related to
3 [WAC 173-303-330\(1\)\(d\)](#) are trained to perform their duties in compliance with [WAC 173-303](#). Actual
4 job tasks, referred to as duties, are used to determine training requirements.

- 5 • The first step taken to ensure that WTP personnel have received the proper training is to
6 determine and document the waste management duties by job title/ and position.
- 7 • In the second step, waste management duties are compared to the general waste management unit
8 training curriculum. If the general waste management unit training curriculum does not address
9 the waste management duties, the training curriculum is supplemented and (or) on-the-job
10 training is provided.
- 11 • The third step summarizes the content of a training course necessary to ensure the training
12 addresses the appropriate waste management duties.
- 13 • The fourth and last step is to assign training curriculum to WTP personnel based on their job title
14 and position. The WTP Dangerous Waste Training Plan will describe this process.

15 Waste management duties include those specified in Attachment 5 and [Tables 8-1 and 8-2](#), as well as
16 those contained in [WAC 173-303-330\(1\)\(d\)](#). Training elements of [WAC 173-303-330\(1\)\(d\)](#) applicable to
17 WTP operations include the following:

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

24 WTP personnel who perform these duties receive training specific to their duties. The WTP Dangerous
25 Waste Training Plan will contain detailed course curricula for the types of training WTP personnel
26 receive based on Attachment 5 and [Tables 8-1 and 8-2](#).

27 **8.3 DESCRIPTION OF TRAINING PLAN**

28 The WTP Dangerous Waste Training Plan will consist of one or more documents and a training database.
29 As allowed under Permit Condition II.C.5.b, training records will be maintained in hard copy and/or
30 electronic media.

31 In accordance with Permit Condition II.C.5.b, the WTP Dangerous Waste Training Plan is maintained
32 outside the Permit, in the WTP Unit-Specific Files of the Hanford Facility Operating Record. Changes to
33 the WTP Dangerous Waste Training Plan are not required to undergo a permit modification. However,
34 any change to this chapter is required to undergo a permit modification, which may affect information
35 contained in the training plan. Upon completion of a permit modification that updates this chapter, the
36 permittee has 6 months to submit an updated WTP Dangerous Waste Training Plan for incorporation into
37 the Operating Record.

38 In accordance with Permit Condition II.C.1, the unit-specific portion of the Permit will contain a
39 description of the training plan.

40 A description of how The WTP Dangerous Waste Training Plan meets the requirements in
41 [WAC 173-303-330\(2\)](#) is as follows:

- 1 1. 330(2)(a): “The job title, job description, and name of the employee filling each job. The job
2 description will include requisite skills, education, other qualifications, and duties for each
3 position.”

4 **Description:** The specific WTP personnel job title and position is correlated to the waste
5 management duties. Waste management duties relating to WAC 173-303 are correlated to
6 training courses to ensure training is properly assigned.

7 Only names of WTP personnel who perform duties relating to waste management operations at
8 the WTP are required to be maintained. Names are maintained as described in the WTP
9 Dangerous Waste Training Plan. A list of personnel assigned to the WTP is available upon
10 request.

11 Information on requisite skills, education, and other qualifications for job title and positions are
12 addressed by providing a reference where this information is maintained (for example, Human
13 Resources). Specific information concerning job title, requisite skills, education, and other
14 qualifications for personnel can be provided upon request.

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

17 **Description:** In addition to the outline provided in Section 8.0, training courses developed to
18 comply with the introductory and continuing training programs are identified and described in the
19 WTP Dangerous Waste Training Plan. As discussed above in Section 8.1, the training plan will
20 be updated to include detailed course curricula for the types of training WTP personnel receive
21 based on the outline in Section 8.0. The type and amount of training is specified in the training
22 plan. Tables 8-1 and 8-2 ~~is-are~~ included as ~~an~~-examples of a typical training matrix that shows
23 typical job/titles and positions matched to a training category. The WTP Training Plan will be
24 developed and submitted in accordance with Permit Condition III.10.C.7, and will include
25 dangerous waste management related job titles and position descriptions, and the type and amount
26 of initial, refresher, and on-the-job training required for each.

- 27 3. 330(2)(c) and 330(3): “Records documenting that personnel have received and completed the
28 training required by this section. The Department may require, on a case-by-case basis, that
29 training records include employee initials or signature to verify that training was received.”

30 **Description:** Training records are maintained consistent with Permit Attachment 5, Section 8.5.5
31 and WAC 173-303-330(3).

32 8.4 CONTINUING TRAINING

33 Initial and continuing training programs are also designed to prepare personnel during the operations
34 phase, and to manage and maintain the WTP in a safe, effective, and environmentally sound manner. In
35 addition to preparing personnel to manage and maintain the WTP under normal conditions, the training
36 programs ensure that personnel are prepared to respond in a prompt and effective manner should off
37 normal or emergency conditions occur. Emergency response training is consistent with the description of
38 actions contained in Part III, Operating Unit Group 10, Chapter 7.0, Contingency Plan. The introductory
39 and continuing training programs are intended to meet the following objectives:

- 40 • Teach WTP personnel to perform their duties in a way that ensures the WTP’s compliance with
41 WAC 173-303 and this permit
- 42 • Teach WTP personnel dangerous waste management procedures (including implementation of the
43 contingency plan) relevant to the job titles and positions in which they are employed
- 44 • Ensure that WTP personnel can respond effectively to emergencies

- 1 • Ensure that the WTP training program is reviewed annually to meet the requirements in
2 [WAC 173-303-330\(1\)\(b\)](#).

3 Continuing training meets the requirements for [WAC 173-303-330\(1\)\(b\)](#) and includes general facility
4 training and unit specific training, as specified below.

5 **General Hanford Facility Orientation:** Annual refresher training is provided for general Hanford
6 Facility training. Refer to description in Permit Attachment 5, Section 5.1.

7 **Contingency Plan Training:** Annual refresher training is provided for contingency plan training. Refer
8 to description above in Section 8.1.

9 **Emergency Coordinator Training:** Annual refresher training is provided for emergency coordinator
10 training. Refer to description above in Section 8.1.

11 **Operations Training:** Refresher training occurs on various frequencies for operations training (i.e.,
12 annual, every other year, every 3 years). When justified, some training will not contain a refresher course
13 and will be identified as a one-time-only training course.

14 **8.5 TRAINING PROGRAM ADMINISTRATION**

15 The WTP Project Training Department is responsible for identifying the appropriate training requirements
16 specified in Attachment 5 and [Tables 8-1 and 8-2](#) to ensure that personnel are trained, qualified, and
17 capable of performing their assigned tasks. Project Training is also responsible for providing the support
18 necessary to ensure that personnel are qualified to safely and effectively meet job requirements.

19 **8.6 JOB TITLE AND JOB DESCRIPTION**

20 The job titles and job positions are specified in Attachment 5 and categorized in [Tables 8-1 and 8-2](#).

21 **8.7 DOCUMENTATION AND RECORD RETENTION**

22 All personnel training records at the WTP facility will be recorded and maintained in the WTP Unit
23 operating record, (Hanford Facility Operating Record), and will be kept onsite or at the permittee's
24 offices located in Richland, Washington, per recordkeeping requirements in Permit Condition II.I and
25 [WAC 173-303-380](#).

26

Table 8-1 Example WTP Training Matrix

Training Category ^a								
Permit Attachment 5 Training Category	General Hanford Facility Training	Contingency Plan Training	Emergency Coordinator Training	Operations Training				
WTP DWTP Implementing Category	Orientation Program	Emergency Management Plan	Emergency Coordinator Training	General Waste Mgmt	Container Mgmt	Tank System Mgmt	Containment Buildings Mgmt	Misc Unit Mgmt
Example Job Title/Position								
Operators	X	X		X		X	X	X
Shift Operations Manager	X	X	X	X	X	X	X	X
Hazardous Waste Operations (HWO) Manager	X	X		X	X	X	X	X
Operations Manager	X	X	X	X				
Environmental Compliance Officer	X			X				
Waste Service Provider	X			X	X			
Hazardous Waste Operators	X	X		X	X	X	X	X
Laboratory Technician –Hazardous Waste Operations (HWO)	X	X		X	X			
Laboratory Technician	X	X						
Laboratory Manager	X	X	X		X			

^a Refer to the WTP Dangerous Waste Training Plan for a complete description of coursework in each training category.

Table 8-2 Lab Operating Training Matrix

<u>Training Category</u>								
<u>Permit Attachment 5 Training Category</u>	<u>General Hanford Facility Training</u>	<u>Contingency Plan Training</u>	<u>Emergency Coordinator Training</u>	<u>Operations Training</u>				
<u>WTP DWTP Implementing Category</u>	<u>Orientation Program</u>	<u>Emergency Management Plan</u>	<u>Emergency Coordinator Training</u>	<u>General Waste Management</u>	<u>Container Management</u>	<u>Tank System Management</u>	<u>Containment Building Management</u>	<u>Misc Unit Mgmt</u>
<u>Job Title/Position</u>								
<u>Dangerous Waste Operator</u>	<u>X</u>	<u>X</u>		<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>
<u>Laboratory Technician</u>	<u>X</u>	<u>X</u>		<u>X</u>	<u>X</u>			
<u>Laboratory Manager</u>	<u>X</u>	<u>X</u>	<u>X</u>		<u>X</u>			