

ATTACHMENT 6

PERSONNEL TRAINING PLAN

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PERSONNEL TRAINING PLAN

1.0 General Information

This section describes the programs in place to train EOD personnel operating the UTTR-North TTU in proper waste management procedures. The TTU is a RCRA treatment, storage and disposal facility (TSDF). As such, its operators must successfully complete a program of classroom instruction and on-the-job training (OJT) that teaches them to perform their duties in a way to ensure the TTU complies with regulatory requirements.

2.0 Outline of the Training Program; Training Content, Frequency, and Techniques [40 CFR 264.16(a)(1), (c), and (d)(3), and UAC R315-8-2.7(a)(1), (c), and (d)(3)]

To better understand the EOD training programs, it is important to know the EOD career field structure. Table 1 summarizes the various EOD job classifications.

The training of these EOD technicians and managers is done in four parts:

- Initial skills training;
- Upgrade training;
- Qualification training; and
- Continuation training.

2.1 Initial Skills Training

Initial skills training in the management of waste munitions is provided to DoD service members by the U.S. Naval School Explosive Ordnance Disposal (NAVSCOLEOD). NAVSCOLEOD conducts training at Eglin AFB, Florida.

The course of instruction is roughly 29 weeks in length, approximately one-third of which consists of classroom and practical training in explosives, explosive effects, and the OB/OD treatment process. The remaining two-thirds of the training builds on the core area of instruction and include training in EOD tools, techniques, and methods and in applying RSPs to placed, fired, launched, or dropped ordnance from the arsenals of the United States and other munitions-producing countries of the world.

Training in OB/OD processes is based on procedures described in the manuals and TOs listed in Table 2. Training in RSPs is based on other munition-specific publications not listed.

Environmental awareness is taught to apprentice trainees and officers at NAVSCOLEOD as part of the EOD curriculum. While the principal focus of the 7-month course is to train DoD members to apply RSPs to UXO, NAVSCOLEOD instructors also discuss the effects of various RSPs (including OB/OD) upon the media (i.e., air, soil, and water).

Additionally, they instruct students in the techniques necessary to maximize the efficiency of OB/OD, thereby minimizing its environmental impact.

Once students successfully complete the course curriculum, AF enlisted personnel are awarded skill level 3 and are assigned to their first duty station. Here, as apprentices, they begin training toward upgrading their skills to skill level 5.

2.2 Upgrade Training

Upgrade training required for the award of the skill levels 5, 7, and 9 consists of in-resident courses, task qualification requirements, Qualification Training Packages (QTPs)¹, and formal Career Development Courses (CDCs)². Upgrade training is summarized in Table 3.

Environmental considerations are taught in each CDC. For example, the skill level 5 CDC teaches safety and environmental factors to be taken into account during EOD operations. Among the various topics, students are taught the impact of OB/OD on air and water quality and the effects of blast and noise on the environment. Later in that same unit, students are taught how to inspect OB/OD-generated scrap and certify it free of explosive residue. Additionally, students learn how to properly manage both explosively-contaminated scrap and the ash that results from treatment operations.

In the skill level 7 technical school, the following environmental objectives are taught:

- EPA regulations affecting EOD operations;
- EPA permitting requirements;
- EPA and DOT manifesting and transporting requirements;
- Documentation required for a permitted or interim status TSDF;
- Emergency provisions of RCRA; and
- The environmental impact of EOD operations on air and water quality, as well as the impact of noise on certain receptors.

2.3 Qualification Training [40 CFR 264.16(a)(2), (a)(3), (b), (c), (d)(3), (d)(4), and (e), and UAC R315-8-2.7(a)(2), (a)(3), (b), (c), (d)(3), (d)(4), and (e)]

Qualification training consists of relevant, hands-on, performance-based training designed to qualify an individual in a specific duty position. This training program occurs both during and after the upgrade training process and is administered to all assigned EOD personnel. It is designed to provide the performance skills training required to do the job. Qualification training begins once an individual graduates from NAVSCOLEOD and is assigned to a duty station or reassigned to a new duty station. Thereafter, qualification training is initiated anytime individuals are assigned duties they are not qualified to perform. Qualification training is grouped as follows:

¹ QTPs are unit-administered instructional courses needed to qualify an individual on an equipment item or procedure. It consists of either printed, computer-based, or other audiovisual instruction material.

² CDCs are correspondence courses designed to upgrade the skills of individuals serving in the field. Enrollment in the progressive CDC program is described in Table 3.

- Group I (monthly). Group I training or operations involve instruction in the use of various EOD tools and techniques to perform RSPs. General demolition techniques used to treat waste explosives in the OB/OD process are also regularly covered.
- Group II (semiannual). Various subjects are taught (including explosive properties and effects, general demolition procedures, and locally assigned or supported munitions), primarily in the classroom environment. Tools are assembled, unique features and safety precautions are briefed, and equipment applications and limitations are discussed. Classroom instructions on procedures (like OB/OD) coincide with Group IV scheduling of practical exercises.
- Group III (annual). This is more classroom training on the hundreds of munitions items with which an EOD technician is expected to be familiar. Additionally, HAFB provides its EOD technicians a special environmental training segment. This is given to individuals arriving at HAFB and annually thereafter. It consists of:
 - An introduction to the TTU and its sites, including applicable use restrictions;
 - Familiarization with Utah DSHW requirements, including the TTUs RCRA permit;
 - A listing of TTU waste streams;
 - A review of approved TTU hazardous waste management procedures and treatment residue handling processes;
 - Required documentation;
 - Radio and cellular telephone communications at the TTU, including the use of emergency signal flares;
 - Use of PPE; and
 - Emergency warning and response procedures.
- Group IV (practical training events and exercises). These consist of team exercises, allowing members to apply knowledge learned in the classroom to formulate plans, select and use equipment, manage personnel, and direct operations to resolve incidents or accident situations involving explosive ordnance.
- Group V (supplementary training). Ancillary or other specialized training required by directive to perform general or specific additional military duties.

2.4 Continuation Training

Continuation training is additional training, either given in-residence, through exportable advanced training courses, or with OJT. It is provided to skill levels 3, 5, 7, and 9 personnel and is designed to increase their skills and knowledge beyond the minimum required. It emphasizes present or future duty assignments.

2.5 O&M Personnel Training

The Range Operations Officer will ensure that all O&M contractor personnel are fully trained in accordance with the appropriate supplements before assuming range duties. The Range Operating Agency has developed O&M contractor personnel training curriculum and maintains record folders reflecting the training. Training for contractors includes local range operating procedures, maintenance requirements, and safety. The following subject areas are covered in a two-hour training session involving lecture from trained personnel and the use of video:

- Local range operating procedures;
- Maintenance procedures and issues;
- Hazardous Materials/Hazardous Waste and local environmental procedures;
- Poisonous or dangerous fauna and flora;
- Local weather hazards;
- Fire-fighting support procedures;
- Local safety, emergency, and contingency procedures;
- Basic first aid procedures;
- Explosive and other ordnance hazards (EOD briefings); and
- Range access control and security procedures.

3.0 Training Director [40 CFR 264.16(a)(2) and UACR 315-8-2.7(a)(2)]

Initial training of EOD technicians in waste munitions treatment operations is conducted at the NAVSCOLEOD (see Section 2.1). This school also develops upgrade training courses, teaching advanced waste munitions treatment techniques (see Section 2.2). NAVSCOLEOD training is directed by a senior EOD officer and staffed by other EOD officers and technicians from all DoD components (U.S. Navy, U.S. Army, U.S. Marine Corps, and USAF). Each training staff member is a graduate of NAVSCOLEOD and recommended by their respective Service for instructor duty at the school. Recommendations are based on an individual's teaching skills, knowledge, and experience in their Services EOD career fields. Once assigned to NAVSCOLEOD, each instructor is trained in lesson plan development, classroom and field instructional techniques, and in testing and evaluation methodology.

Qualification training in specific waste management practices at the UTTR-North TTU is conducted by the 75th Civil Engineer Group, 775 Civil Engineering Squadron, EOD Flight, Training Element (see Sections 2.2 and 2.3). This training is directed by the branch chief, a senior EOD technician, and carried out by EOD training flight staff. Each person in the branch is taught in training program administration and the documentation requirements of in-resident AF courses.

4.0 Training for Emergency Response [40 CFR 264.16(a)(3) and UAC R315-8-2.7(a)(3)]

Initial NAVSCHOLEOD and follow-on training described above ensure personnel assigned to the TTU receive emergency response training. Personnel are required to read and understand

various publications containing emergency response procedures. These include, but are not limited to, the publications listed in Table 2.

5.0 Implementation of the Training Program [40 CFR 264.16(b), (d)(4), and (e) and UAC R315-8-2.7(b), (d)(4), and (e)]

All EOD personnel currently performing hazardous waste handling and treatment duties at the UTTR-North TTU have completed the training requirements outlined above within 6 months of their assignment to the unit. As future personnel are assigned duties at the unit, they will also receive the same training within 6 months of reporting for duty. Refresher or qualification training is conducted at the intervals prescribed; the minimum being annually.

6.0 Training Program Documentation

Records documenting the training programs completed by each individual assigned TTU duties are maintained by the 75 Civil Engineer Group, 775 Civil Engineering Squadron, EOD Flight, HAFB. Copies of these training records are Web based, and accessible from/also maintained at the Oasis EOD office. Training records of individuals that leave the HAFB EOD Flight are web based and can be retrieved by the EOD training flight if requested.

TABLE 1
EOD Job Titles and Descriptions
[40 CFR 264.16(d)(1) and (d)(2) and UAC R315-8-2.7(d)(1) and (d)(2)]

Skill Level Identifier	Job Title	Job Description
3	Apprentice	Detects, identifies, renders safe, recovers, or destroys U.S. and foreign explosive, incendiary, toxic, and nuclear ordnance
5	Journeyman	Detects, identifies, renders safe, recovers, or destroys U.S. and foreign explosive, incendiary, toxic, and nuclear ordnance
7	Craftsman	Supervises teams in the detection, identification, rendering safe, recovery, or destruction of U.S. and foreign explosive, incendiary, toxic, and nuclear ordnance
9	Superintendent	Superintends flights in detecting, identifying, rendering safe, recovering, or destroying U.S. and foreign explosive, incendiary, toxic, and nuclear ordnance
N/A	Officer	Provides command oversight of flights in the detection, identification, rendering safe, recovery, or destruction of U.S. and foreign explosive, incendiary, toxic, and nuclear ordnance

TABLE 2
OB/OD Operational Directives

Number and Date	Title and Security Classification	Purpose
EOD OI 32-3004, 15 May 2011	Transportation of Demolition Explosives, Unclassified	Prescribes the procedures for transporting demolition explosives on- and off-base by EOD personnel. (Note: All EOD OIs are published by the EOD Flight at HAFB.)
EOD OI 32-3003, 09 Jan 2012	Disposal Operations on the Thermal Treatment Unit (TTU), Unclassified	Establishes procedures to be used by qualified EOD personnel to dispose of ADR munitions at the TTU.
AFM 91-201, 12 Jan 2011	Explosives Safety Standards, Unclassified	Implements AF policy regarding explosives safety. It details procedures to be used during explosives testing, storage, transportation, and treatment.
TO 11A-1-42, 15 Jul 1979, Change 6-Oct 2000	General Instructions for Disposal of Conventional Munitions, Unclassified	Provides detailed instructions to EOD personnel in the treatment of unserviceable, serviceable excess, or obsolete munitions and explosive items (except nuclear).
TO 11A-1-60, 15 Jan 2007, Change 1-Feb 09,	Inspection of Reusable Munitions Containers and Scrap Material Generated from Items Exposed to, or Containing Explosives, Unclassified	Establishes the requirements for an inspection and certification program to prevent the sale, transfer, turn-in, treatment, or shipment of material or reusable munitions containers contaminated by explosives.
TO 60A-1-1-9, 09 Oct 2001	Description of and Disposal Procedures for Conventional Explosives and Related Hazardous Materials, FOUO	Furnishes EOD personnel with basic information necessary for the recognition, identification, and treatment of conventional explosives and related material.
TO 60A-1-1-31, 24 Apr 2009, Revision 6,	EOD Disposal Procedures: General Information on EOD Disposal Procedures, FOUO	Provides EOD personnel with basic information on effective and safe EOD treatment procedures. The treatment procedures described cover low and high explosives and incendiary items.

TABLE 3
EOD Upgrade Training

Skill Level Identifier	Job Title	Required Training
3	Apprentice	Skill level 3 is awarded upon graduation from NAVSCOLEOD (at Eglin AFB, Florida); therefore, there is no upgrade to this skill level.
5	Journeyman	Upgrade training to skill level 5 starts after a minimum 3-month supervised duty as a skill level 3. Prior to award, individuals must complete 12 months of OJT . Upgrade training consists of task and knowledge training provided in the EOD skill level 5 CDC, completion of OJT in the core task requirements identified in STS, and completion of skill level 3 technical school.
7	Craftsman	Upgrade training to skill level 7 starts once an individual is selected for promotion to the rank of Staff Sergeant. Prior to award, individuals must complete 12 months of OJT. Upgrade training consists of OJT in the core task requirements identified in the STS and completion of skill level 7 technical school.
9	Superintendent	Upgrade to skill level 9 begins once an individual is promoted to the rank of Senior Master Sergeant. Prior to award, individuals must attend the Senior Noncommissioned Officer Academy and Civil Engineer Superintendent Course.
N/A	Officer	Skills training consists of task and knowledge instruction provided in the officer resident courses conducted by NAVSCOLEOD at Eglin AFB, Florida.

STS = Specialty Training Standard