

ATTACHMENT 5

PERSONNEL TRAINING PLAN

Contents

1.0	Introduction.....	5-1
2.0	Outline of Training Program.....	5-1
2.1	Job Titles and Duties	5-1
2.2	Training Content, Frequency, and Techniques	5-1
2.3	Training Director	5-2
2.4	Relevance of Training to Job Position.....	5-2
2.5	Training for Emergency Response	5-2
2.6	Procedures for Using, Inspecting, Repairing, and Replacing the HWSF Emergency and Monitoring Equipment	5- 32
2.8	Communications or Alarm Systems	5-3
2.9	Response to Fires or Explosions	5-3
2.10	Response to Groundwater Contamination	5-3
3.0	Implementation of Training Program	5-3

Table

5-1	Job Titles and Duties
<u>5-2</u>	<u>RCRA Facility Personnel Training Matrix</u>
<u>5-3</u>	<u>Summary of Training Course Content</u>

1.0 Introduction

1.0.1 This Attachment outlines training plans for ~~personnel at the~~ Hazardous Waste Storage Facility (HWSF) staff, in accordance with Utah Administrative Code (UAC) R315-8-2.7264-16.

2.0 Outline of Training Program [UAC R315-8-2.7264-16(a)(1) and, (2)]

2.0.1 The HWSF personnel who manage hazardous wastes shall successfully complete a program of classroom instruction and on-the-job training in order to operate and maintain the HWSF in a safe manner and in a manner that ensures compliance with the requirements of UAC R315-264. No employee shall work unsupervised until he or she has completed either the formal training courses, the equivalent in on-the-job training, or a combination of the two as outlined in Section 2.2 of this Attachment.

2.0.2 The curriculum established for personnel includes handling, storing, and transporting hazardous wastes and complies with training requirements in UAC R315-8-2.7264-16(a)(3). Employees involved in managing or handling hazardous wastes shall participate in training.

2.1 Job Titles and Duties [UAC R315-8-2.7264-16(d)(1) and (2)]

2.1.1 Current duties, responsibilities, and qualifications of the positions are listed in Table 5-1. This table shall be updated as job descriptions and duties change in accordance with Condition 4.D of the Permit.

2.2 Training Content, Frequency, and Techniques [UAC R315-8-2.7264-16(c) and (d)(3)]

2.2.1 The training program for employees managing hazardous wastes combines supervised on-the-job instruction and formal classroom training.

2.2.2 On-the-job training provides employees with the following:

- Physical layout of the facilities including location and use of emergency equipment.
- Basic hazardous material/hazardous waste disposal policies of the HWSF (acceptance requirements, analysis, packaging, and recordkeeping).
- Basic procedures in handling, storing, and manifesting hazardous waste.
- Inspection and procedures for correcting inadequacies found.
- Emergency procedures, such as spill response, fire response, evacuation and evacuation plan, or explosions response and implementation of the contingency plan.
- Opportunity to read and understand training material which outlines procedures so that hazardous wastes are safely managed at the HWSF.

- Opportunity to read and understand training material which provides procedures for receiving hazardous waste.
- Opportunity to read and understand training material which provides procedures for storing hazardous waste.

2.2.3 ~~After~~In addition to receiving sufficient on-the-job training, employees involved in managing or handling hazardous waste shall take the following formal courses, or the equivalent training, dealing with hazardous waste management:

- ~~Hazard Communication training (HAZCOM) as required by 29 CFR 1910.1200~~ Hill air Force Base TSDF Operator Training as required by R315-264-16 UAC.
- Hazardous Waste Operations and Emergency Response training (HAZWOPER) as required by 29 CFR 1910.120

2.2.4 ~~In addition, those employees~~ Employees who are involved in transporting hazardous waste over public roads or preparing hazardous waste manifests shall take the following course or receive the equivalent training (e.g., as part of the TSDF Operator Training Course):

- U.S. Department of Transportation (DOT) training as required by 49 CFR 172.704

2.2.5 HWSF personnel who handle hazardous wastes shall meet annually to review the contingency plan, discuss the effectiveness of their training programs and recommend program needs.

2.2.6 Training Matrix and Course Content Summary

Training requirements for each position listed in Table 5-1 are identified in Table 5-2. A summary of the content of each course is listed in Table 5-3.

2.3 Training Director [UAC R315-8-2.7264-16(a)(2)]

2.3.1 The HWSF ~~Chief Operations Manager~~ is the training director and is responsible for overseeing the training of the HWSF personnel. The training director shall take the courses listed in Section 2.2 as specified in Table 5.2 of this Attachment.

2.4 Relevance of Training to Job Position [UAC R315-8-2.7264-16(a)(2)]

2.4.1 Training is required for all HWSF personnel as outlined in Section 2.2 and as specified in Table 5.2 of this Attachment. The courses discussed provide instruction in the safe storage of hazardous materials and wastes and emergency actions. These are minimum requirements. Additional training is encouraged.

2.5 Training for Emergency Response [UAC R315-8-2.7264-16(a)(3)]

2.5.1 HWSF employees receive emergency response training. On-the-job training requires that each employee read and understand the HWSF contingency plan

outlined in Attachment 7 (Contingency Plan and Emergency Procedures) of this Permit. Drills shall be held annually to familiarize employees with evacuation, evacuation plan and other emergency procedures.

2.6 **Training Regarding Procedures for Using, Inspecting, Repairing, and Replacing the HWSF Emergency and Monitoring Equipment [UAC R315-8-2.7264-16(a)(3)(i)]**

2.6.1 The HWSF emergency and monitoring equipment shall be routinely inspected in accordance with the General Inspection Schedule, which is provided in Attachment 4 (General Inspection Requirements) of this Permit. On-the-job training shall be provided annually as to the locations of equipment, how to inspect, maintain and use each item, and replacement of equipment (if necessary) after the emergency is over.

2.87 **Communications or Alarm Systems [UAC R315-8-2.7264-16(a)(3)(iii)]**

2.87.1 Areas of HWSF personnel shall have annual training in areas with respect to communications or alarm systems and shall include supervised on-the-job training in types of equipment available at the site and how to use them, locations of equipment, emergency telephone numbers to be used to summon external assistance, alarm codes, how to maintain the equipment, and frequency of serviceability checks.

2.98 **Response to Fires or Explosions [UAC R315-8-2.7264-16(a)(3)(iv)]**

2.98.1 To augment the capabilities of HWSF personnel, the fire department on Hill AFB is continuously prepared to respond to fires involving hazardous wastes. Specific procedures that shall be followed in the event of a fire or explosion are outlined in Attachment 7 (Contingency Plan and Emergency Procedures) of this Permit. Personnel shall be trained annually in their contingency plan and emergency response responsibilities, evacuation procedures and means of exit from their respective work areas. Drills shall be held annually to practice these procedures.

2.109 **Response to Groundwater Contamination [UAC R315-8-2.7264-16(a)(3)(v)]**

2.109.1 —PFacility personnel shall be trained annually in spill response and contingency plan implementation as required in Attachment 7 (Contingency Plan and Emergency Procedures) of the Permit. At a minimum, one simulated spill shall be conducted each year to test the effectiveness and response of the emergency response team.

3.0 **Implementation of Training Program [UAC R315-8-2.7264-16(b) and (d)(4)]**

3.0.1 All HWSF employees assigned to manage hazardous wastes shall complete the training courses described in Section 2.2 and as specified in Table 5.2 of this

Attachment or a refresher training course, if applicable, within 6 months of their hire date or assignment to the facility or to a new position at the facility.

- 3.0.2** No employee will work unsupervised with hazardous wastes until he or she successfully completes on-the-job training. This training may be provided by current employees or managers who are trained in hazardous waste management at the HWSF. Formal training programs shall be attended by personnel as required by their duties.
- 3.0.3** Records documenting the job title for each position, job descriptions, employee names, and completed training programs (both introductory and review) shall be documented in the Operating Record. These records shall be kept until closure of the HWSF for current employees, and for three years from the date the employee last worked at the HWSF.
- 3.0.4** In addition to the 24- or 40-hour training mentioned above, initial training shall be accomplished through on-the-job training within the first 6 months of employment or assignment to hazardous waste operations. This training shall cover the topics of pre-inspection/receiving, storage compatibility, hazardous waste manifesting, emergency response, and RCRA and state hazardous waste regulations including the Permit. This initial training shall be completed before an employee is allowed to work unsupervised.
- 3.0.5** An annual review of the initial training shall be conducted for employees involved in the management of hazardous wastes. This review is referred to as 8-hour refresher training.

TABLE 5-1
Job Titles and Duties

<u>Position Title</u>	<u>Description</u>	<u>Primary Duties</u>
Hazardous Waste Program Manager	<p>Oversees the identification, characterization, and coding of hazardous waste and waste oil generated and removed from Hill AFB. This includes wastes that are processed through the HWSF and any that are not. Oversees compliance with state and federal hazardous waste regulations and Air Force instructions. Develops and implements base-specific policies. Oversees permit development and compliance.</p>	<p>Maintains close liaison with the laboratory and reviews the analytical work requested for adequacy. Develops analytical procedures and maintains quality control for recycling processes. Procures necessary equipment, materials, and supplies and oversees that equipment is maintained properly. Oversees that required analytical and testing equipment and supplies are obtained and maintained.</p> <p>Coordinates with <u>Environmental Management, Prevention Division (EMP) Environmental Branch (CEIE)</u> personnel and <u>organizational environmental representatives</u> to achieve the goals and objectives of the Hazardous Waste Program.</p> <p>Maintains personal contacts with local and state government agencies, military commands, and General Services Administration.</p>
HWSF Chief Operations Manager/ Training Director	<p>Directs the operations at the HWSF; provides assistance and guidance to commands served; and is the technical authority on disposal matters.</p> <p>Oversees analysis and documentation of data, including waste stream numbers, Environmental Protection Agency (EPA) <u>waste code</u> numbers, DOT codes and disposition codes. Makes disposition decisions on wastes processed through the HWSF.</p> <p>Oversees training of HWSF personnel.</p>	<p>Responsible for the overall operation of the HWSF in accordance with the Hazardous Waste Management Plan and applicable regulations. Serves as the primary responsible person overseeing the timely flow of waste containers through the HWSF.</p> <p><u>Acts as primary point of contact with Hill AFB Fire and Emergency Services in response to contingency plan events at the HWSF.</u></p> <p><u>Oversees the identification, characterization, and proper management of solid and hazardous wastes, including coding of hazardous waste generated and removed from Hill AFB. This includes wastes that are processed through the HWSF and any that are not.</u></p> <p>Interprets regulations and develops necessary operating procedures as required. Determines requirements for manpower, space, and equipment, and initiates required actions.</p> <p>Maintains coordination with generators and contract personnel <u>to ensure compliance with so that</u> all DOD, federal, and state environmental requirements <u>are complied with</u> in both receipt and disposal of hazardous waste.</p> <p>Determines need for modifications to existing facilities and initiates action to improve economy, efficiency, safety, and physical security of operations. Develops appropriate requirements and initiates requests for work.</p>

HWSF Supervisor	Supervises the operations of the environmental program at the Hazardous Waste Storage Facility disposing of hazardous material/waste. Acts as safety officer for the HWSF. Conducts HWSF personnel training.	Conducts onsite review/inspections of the environmental operations at the HWSF staff level. Trains technicians and operators in correct sampling and analytical procedures and <u>oversees ensures</u> that they are done in accordance with training <u>and the Permit</u> . Conducts seminars and orientations. Resolves problems associated with the receipt and disposal of hazardous material/waste. Exercises full technical and administrative responsibility over subordinate staff. <u>Maintains close liaison with the laboratory and reviews the analytical work requested for adequacy.</u>
Hazardous Waste Lead Technician	Serves as the HWSF staff hazardous property focal point and advises the HWSF Supervisor on hazardous material/waste matters. Responsible for ensuring compliance with requirements relative to receiving, handling, storing, packaging, and disposing of hazardous material/waste. Provides technical guidance to HWSF staff personnel involved in all aspects of hazardous material/waste processing.	Conducts periodic inspections so that hazardous material/waste storage areas are maintained in accordance with pertinent state and federal environmental regulations <u>and the Permit</u> , and that material turned in by generating activities is properly identified and packaged. Assists the on-scene coordinator in response to contingency plan events at the HWSF; reacts to spillage by containment, cleanup, and decontamination of the spill site. Assists HWSF Supervisor in providing on-the-job training for HWSF staff personnel involved with hazardous materials/wastes operations.
Hazardous Waste Technician	Responsible for ensuring compliance with requirements relative to receiving, handling, storing, packaging, and disposing of hazardous property.	Conducts periodic inspections so that hazardous property storage areas are maintained in accordance with pertinent state and federal environmental regulations <u>and the Permit</u> , and that material turned in by generating activities is properly identified and packaged. Assists the on-scene coordinator in response to contingency plan events at the HWSF; reacts to spillage by containment, cleanup, and decontamination of the spill site. Inspects hazardous materials/wastes and takes samples for analysis as needed for waste characterization. Perform basic waste screening lab operations.

Table 5-2 RCRA Facility Personnel Training Matrix

<u>Training Course</u>	<u>Frequency</u>	<u>Job Title</u>				
		<u>HW Program Manager²</u>	<u>HWSE Operations Manager</u>	<u>HWSE Supervisor</u>	<u>HWSE Lead Technician</u>	<u>Hazardous Waste Technician</u>
1) <u>On-the-Job Training¹</u>	<u>one-time</u>		●	●	●	●
2) <u>Hill Air Force Base TSDF Operator Training</u>	<u>annual</u>	●	●	●	●	●
3) <u>HAZWOPER³</u>	<u>annual</u>		●	●	●	●

Notes:

¹ On-the-job training (OJT): training IAW 29 CFR 1910.120(e)(1) is provided by a supervisor or qualified Technician for a three-day period in accordance with (IAW) and 29 CFR 1910.120 (e) (3) and reading Standard Operating Procedures specific to tasks the employee will perform. Required within six months of initial assignment.

² The Hazardous Waste Program Manager does not perform waste management or spill response activities at the TSDF, however he/she audits the annual operator training course to ensure program continuity.

³ 40-hr HAZWOPER training IAW 29 CFR 1910.120 (e) (1) (ii) and (e) (2) (i-vi): Required within six months of initial assignment and annually thereafter as 8-hr HAZWOPER refresher.

Table 5-3 Summary of Training Course Content

<u>Training Course</u>	<u>Course Content Includes:</u>
<p><u>1) On-the-Job Training (OJT)</u> <u>Reoccurrence: 1 time</u> <u>Documented via OJT employee acknowledgment form roster</u></p>	<ul style="list-style-type: none"> • <u>Physical layout of the facilities including location and use of emergency equipment.</u> <ul style="list-style-type: none"> ○ <u>Hill Air Force Base Resource Conservation and Recovery Act Part B Permit for Storage of Hazardous Waste (Hill Part B Permit) - Attachment 7 Contingency Plan and Emergency Procedures; Standard Operating Procedures (SOP)¹</u> • <u>Basic hazardous material/hazardous waste disposal policies of the HWSF (acceptance requirements, analysis, packaging, and recordkeeping). HAZCOM</u> <ul style="list-style-type: none"> ○ <u>Hill Part B Permit - Attachment 2 Waste Analysis Plan (WAP).</u> • <u>Basic procedures in handling, storing, and manifesting hazardous waste.</u> <ul style="list-style-type: none"> ○ <u>Hazardous Communications (HAZCOM) Training; SOPs</u> • <u>Inspection and procedures for correcting inadequacies found.</u> <ul style="list-style-type: none"> ○ <u>Hill Part B Permit TABLE 4-1, General Inspection Schedule; SOPs; Attachment 4 General Inspection Requirements; SOPs</u> • <u>Emergency procedures, such as spill response, fire response, evacuation and evacuation plan, or explosions response and implementation of the contingency plan.</u> <ul style="list-style-type: none"> ○ <u>Hill Part B Permit - Attachment 7 Contingency Plan and Emergency Procedures and Attachment 4 General Inspection Requirements; Site-Specific Health & Safety Plan (SSH&SP); SOPs</u> • <u>Opportunity to read and understand training material which outline procedures so that hazardous wastes are safely managed at the HWSF.</u> • <u>Opportunity to read and understand training material which provide procedures for receiving hazardous waste.</u> • <u>Opportunity to read and understand training material which provides procedures for storing hazardous waste. HWMP/SOPs</u>

¹ There are multiple Standard Operating Procedures (SOP) for the management of hazardous waste at Hill AFB. Employees will read and sign-off on all SOPs specific to the TSDF.

Table 5-3 Summary of Training Course Content

<u>Training Course</u>	<u>Course Content Includes:</u>
<p><u>2) Hill Air Force Base TSDF Operator Training</u></p> <p><u>Reoccurrence: annual (initial within 6 months of initial assignment)</u></p> <p><u>Documented via employee attendance roster</u></p>	<ul style="list-style-type: none"> • <u>HAZCOM-IAW 29 CFR 1910.1200</u> <ul style="list-style-type: none"> ○ <u>Globally Harmonized System (GHS)</u> ○ <u>Principles of Chemical Hygiene</u> ○ <u>Engineered Controls</u> ○ <u>Monitoring Exposure</u> • <u>TSDF Contingency Plan Training module:</u> <ul style="list-style-type: none"> ○ <u>Contingency Plan, Hazardous Waste Storage Facility (HWSF) overview</u> ○ <u>What triggers Contingency Plan implementation?</u> ○ <u>Discuss the Emergency Response and Notification responsibilities</u> ○ <u>Discuss procedures followed by the facility manager and/or individual discovering the spill</u> ○ <u>Review Evacuation Plan details; including evacuation maps for the HWCF and HWSF</u> • <u>Evacuation Drill: Each member of the hazardous waste support team, contractor and civilian, participate in an exercise where they discuss the implementation plan for the respective facility (HWSF and HWCF) followed by an evacuation of the facility to the evacuation points and a head-count conducted.</u> • <u>Hazardous Waste Familiarity</u> <ul style="list-style-type: none"> ○ <u>Solid and hazardous waste definitions (R315-261-2 and R315-261-11 UAC)</u> ○ <u>Categories of hazardous waste (F-listed, K-listed, P and U listed, and D-listed I, C, R, T waste)</u> ○ <u>Waste determination and Hazardous Waste Management at Hill AFB</u> ○ <u>Initial Accumulation Point (IAP) a.k.a. Satellite Accumulation Areas (SAA) IAW R315-262-15 UAC and AFI 32-7042</u> ○ <u>Hazardous Waste Accumulation Site (HWAS) a.k.a. 90 Day Sites or Central Accumulation Areas (CAA)</u> ○ <u>RCRA Permitted Facility (TSDF) IAW R315-264 UAC</u> ○ <u>CAA requirements IAW R315-262-17 UAC (LQG)</u> ○ <u>Contingency Plan requirements IAW 40 CFR 262 Subpart M and the Quick Reference Guide</u> ○ <u>Training required IAW AFI 32-7042(2.6), 40 CFR 265.17, 29 CFR 1910, 49 CFR 172.704</u> • <u>DOT HAZMAT and Hazardous Waste Manifest</u> <ul style="list-style-type: none"> ○ <u>General requirements, the hazardous materials table, shipping documentation, packaging & marking, labeling, placarding, loading & storage and emergency response.</u> ○ <u>Basic Uniform Hazardous Waste Manifest (UHWM) IAW 49 CFR 172.704 review.</u>

Table 5-3 Summary of Training Course Content

<u>Training Course</u>	<u>Course Content Includes:</u>
<u>3) HAZWOPER IAW 29 1910.120</u> <u>(40 hour initial and 8 hour annual refresher)</u> <u>Reoccurrence: annual</u> <u>Documented via training certificate</u>	<ul style="list-style-type: none">• <u>CFR 29 1910.120 (p): Operations under RCRA</u>• <u>CFR 29 1910.120 (q): Emergency response to releases</u>• <u>(q)(6)(I-V): levels –</u><ul style="list-style-type: none"><u>(i) First Responder Awareness level;</u><u>(ii) First Responder Operations level;</u><u>(iii) Hazardous Materials Technician;</u><u>(iv) Hazardous Materials Specialist;</u><u>(v) On Scene Commander</u>