

**ATTACHMENT 5**  
**TRAINING PLAN**

## TRAINING PLAN FOR HAZARDOUS WASTE MANAGEMENT PROGRAM AND AMMUNITION OPERATIONS

### 1.0. GENERAL

#### 1.1. PURPOSE

Employee training at Tooele Army Depot (TEAD) is crucial to the accomplishment of all the Facility's missions and the requirement to provide environmental training is a top priority. The TEAD Hazardous Waste Management Training Program is formal program designed to enhance the environmental competencies of its participants and to promote responsible environmental practices throughout the organization. This training was developed and implemented to meet the requirements of Utah Admin. Code R315-264-16 for employees involved in hazardous waste operations. Specific course work has been outlined for this program, which contains material appropriate for accomplishing these objectives. Employees must successfully complete training specific to their duties in hazardous waste management procedures within six months of their appointment to this type of position and shall not work in unsupervised situations until training requirements are met. Hazardous waste duties may be delegated to an employee on a temporary basis, not more than six months, as long as they are performed under the direction of trained personnel while working in a hazardous waste management unit. Personnel must also participate in an annual review of this training.

#### 1.2. SCOPE AND APPLICATION

All employees involved in the management, storage, treatment or handling of hazardous waste at the Facility's RCRA regulated or permitted facilities, including those on temporary appointments, are required to participate in the hazardous waste management training program. The types of duties an employee may engage in when dealing with hazardous waste includes, but is not necessarily limited to, coordination, engineering, technical work, transportation, containerization, labeling, storage, identification, record keeping, emergency response, and treatment. Tenant activities and contractors may operate a separate program as long as the training which is provided to their personnel meets regulatory compliance and is equivalent to, or greater than, the requirements of this program. Records and documents associated with such a program shall be made available for regular inspections by the Environmental Management Division (EMD).

#### 1.3. SUPPLEMENTAL TRAINING

The development of program members and the benefit to be derived by the environment and employee health and safety, will be assured only through a total commitment to successful completion of all course work. However, the outlined courses should not be considered all inclusive. Constant changes in the area of environmental compliance and needs which may be specific only to some functions will necessitate the need for supervisors and employees to seek out additional training to complement this program. A wide range of related course work is offered by the U.S. Army Defense Ammunition Center and School (the Army Logistics Management College), the School of Military Packaging Technology, the Naval Transportation Management School, academic institutions, and private sources.

### 2.0. PROGRAM ADMINISTRATION

## 2.1. CHIEF OF ENVIRONMENTAL MANAGEMENT DIVISION

The Permittee's hazardous waste management training program is directed by the Chief of the EMD. He reviews and approves the content, method of presentation, and evaluation techniques for all courses developed in support of Permittee's hazardous waste management training program. The EMD Chief shall ensure that individuals providing instruction or instructional support meet stringent standards which take into consideration educational degrees, professional certifications, schools/training, work history and knowledge.

## 2.2. TRAINING INSTRUCTORS

Training shall be taught by individuals proficient in State and Federal hazardous waste regulations and well versed in the area of hazardous waste management. Instructors shall maintain their knowledge base by keeping abreast of changes in the regulations and by taking refresher training as directed by the Chief of the EMD from organizations and companies that are well known and recognized for their hazardous waste training.

## 2.3. RECORD KEEPING/REPORTS/DOCUMENTATION

2.3.1. Documentation of course attendance and records which can be substantiated is a critical aspect of this program. All Facility personnel whose duties directly involve the storage, treatment, or handling of hazardous waste must successfully complete the applicable training courses that teach them to perform their duties in a way that ensures that the Facility will be in compliance with the requirements of the State of Utah Hazardous Waste Management Rules.

2.3.2. Participation in the courses shall be documented by a computer based recordkeeping system (Total Employee Development System (TEDS)) used for documenting all training required by the Facility employees. Successful completion of the courses shall require the employee to pass an exam that shall be retained by the EMD. These exams are available for inspection and copying by employees, their representatives and other government agencies with relevant responsibilities.

2.3.3. Documentation is further aided by TEDS, which can generate various reports. TEDS contains such information as employees' names, organizations, job numbers, course, date of initial training and when the refresher course is due.

## 2.4. PARTICIPANT CHANGES

The EMD shall maintain a current list of personnel participating in the TEAD Hazardous Waste Management Program. The following procedures shall be followed to add or remove an employee from list of active personnel:

2.4.1.. To enter the Hazardous Waste Training Program the employee's organization must submit a request to the EMD to add the employee. The request must indicate the employee's name, job title, job number, and identify the employee's hazardous waste duties and/or the hazardous waste management units at which the employee will work. The EMD shall enter the employee's information into the hazardous waste management

program. The EMD shall inform the depot Training Officer of the addition of the employee into the hazardous waste management program and which hazardous waste courses the employee will be required to take. The depot Training Officer shall update TEDS appropriately to reflect the employee addition. The employee shall have six months to take and pass the applicable training courses or the employee shall be dropped out of the program. The employee shall not be allowed to work unsupervised by a trained employee until the employee has passed the applicable training courses.

2.4.2. To remove an employee from the Hazardous Waste Management Training Program the employee's organization must submit a request to the EMD noting the individual no longer has hazardous waste management duties. The EMD shall then remove the individual from the list of active members in the environmental management program.

2.4.3. Organizations permanently transferring employees who are in the Hazardous Waste Management Training Program from one hazardous waste management unit to another position must notify the EMD of the change. The notification must detail the old and new positions and the effective date of the transfer. The EMD shall then instruct the depot Training Officer to update the employee's training profile in TEDS.

2.4.4. Hazardous waste management and handling duties may not be delegated to anyone on a temporary basis (no matter how short the length of time) unless they are performed under the direction of personnel that are trained in the management of hazardous waste and for a duration of less than six months; all persons must be formally designated using the preceding procedure.

2.4.5. Anyone having hazardous waste management and handling duties shall be dropped from the program by the EMD if the individual does not complete training in the prescribed time frames. The EMD shall send notice to the Director of the employee's organization notifying them that the person is being dropped from the program. The employee's organization shall then not allow the employee to perform hazardous waste management duties unsupervised until the deficient training is completed.

## 2.5. CERTIFICATES

Employees that have received and successfully completed the initial training course shall be provided a certificate by the EMD that documents completion of the course.

## 2.6 TRAINING MODULES

Based upon individual training requirements for employees with hazardous waste duties at differing RCRA regulated facilities three training courses have been developed. An outline of each course is available in Appendix A of this Attachment.

## 2.7 JOB DESCRIPTION

2.7.1. The job descriptions of all employees with hazardous waste duties shall include the following statement;

“Performs hazardous waste management duties and/or hazardous waste worker duties in permitted or regulated facilities. Duties may involve one or more of the following: Management, coordination, engineering, or technical work involving hazardous waste management programs or projects; or movement, containerization, storage, identification, record keeping, emergency response procedures, treatment, and/or disposition of hazardous waste. Such duties require the ability to interpret and implement environmental regulations, knowledge of hazardous waste products and safety regulations, and the skill to comply with regulatory requirements and ensure proper management and/or handling of hazardous wastes. An incumbent must successfully complete training in hazardous waste management procedures within six months after the date of appointment to this position and will not work in unsupervised situations until these training requirements have been met. Incumbent must also participate in an annual review of this training.”

2.7.2. All job descriptions by job titles and job numbers for all hazardous waste management personnel are maintained and available for review at the Facility.

## 2.8 NEW EMPLOYEES

Training for new personnel is initiated at the time they start work at the Facility if they are to be involved in hazardous waste operations. Training shall consist of hazardous waste management procedures, to include site specific training covering communications and/or alarm systems, contingency plans for fires, explosions, and incidental spills, and any procedures necessary for shut down operations.

## 3.0. TRAINING AND CERTIFICATION PROGRAM FOR PERSONNEL WORKING IN AMMUNITION OPERATIONS

In addition to the requirements for personnel working in hazardous waste areas, personnel working in hazardous waste ammunition areas adhere to the requirements in the latest version of TEAD Regulation No. 350-1, *Training and Certification Program for Personnel Working in Ammunition Operations*. All personnel assigned to conduct or support demilitarization operations must pass *Hazardous Familiarization Training*, as a minimum requirement. This training consists of two primary elements, the Defense Ammunition Center (DAC) *Introduction to Ammunition* (AMMO-45), a CD-ROM self-taught program and a locally developed orientation program. Personnel conducting demil operations involving the set up and activation of charges, burning operations or other comparable activities are required to attend the *Ammunition Demilitarization Course*. All formal ammunition-training records are maintained in TEDS.

## APPENDIX A

### HAZARDOUS WASTE MANAGEMENT TRAINING PROGRAM COURSE OUTLINE

- **Course 1: HAZARDOUS WASTE FUNDAMENTALS, ACCUMULATION, AND STORAGE**
  - **Identify federal, state, and Army regulations**
    - Resource Conservation and Recovery Act (RCRA)
    - Federal Facilities Compliance Act (FFCA)
    - Utah Solid and Hazardous Waste Act
    - Utah hazardous waste management rules
  - **Outline the responsibilities of members of the hazardous waste management program**
    - Commander's Responsibilities
    - Duties of the Environmental Management Division
    - Duties of Hazardous Waste Generators
    - Duties of Operators of Hazardous Waste Storage and Treatment Facilities
  - **Explain pollution prevention requirements and benefits as they pertain to hazardous waste**
    - Hazardous Waste Prevention
    - Benefits of Pollution Prevention
  - **Explain Spill Response Requirements**
  - **Define hazardous waste**
    - Hazardous Waste Defined
    - Examples of Hazardous Waste
  - **Describe generation point hazardous waste management requirements**
  - **Identify 90-day area requirements for hazardous waste management**
  - **Identify the requirements for handling hazardous waste at permitted hazardous waste storage facilities.**
    - Operational Requirements and Parameters
    - Documentation Requirements
    - Emergency Requirements

## **HAZARDOUS WASTE MANAGEMENT TRAINING PROGRAM COURSE OUTLINE**

- **Course 2: TEAD HAZARDOUS WASTE TREATMENT FACILITIES**
  - **Identify the requirements for the treatment of hazardous waste at the deactivation furnace.**
    - Deactivation Furnace
    - Operational Requirements and Parameters
    - Documentation Requirements
    - Emergency Response
  - **Identify the requirements for the treatment of hazardous waste at the small caliber disassembly line.**
    - Requirements for Operation of the Small Caliber Disassembly Line
    - Operational Requirements and Parameters
    - Documentation Requirements
    - Emergency Requirements
  - **Identify the requirements for the treatment of hazardous waste at the hydrolysis facility.**
    - **Hydrolysis Facility**
    - Operational Requirements and Parameters
    - Documentation Requirements
    - Emergency Requirements
  - **Identify wastes that can be treated at the OB/OD facility.**
  - **Identify the procedures for receiving wastes at the OB/OD facility.**
    - Quantities that can be treated in each process at the facility.
  - **Identify the operating conditions required at the OB/OD facility.**
    - Open Detonation
    - Open Burning In Pans
    - Static Fire
    - Inspection requirements
    - Documentation Requirements
    - Emergency requirements
- **Course 3: HAZARDOUS WASTE – TREATABILITY STUDIES**
  - **Identify hazardous waste management requirements when conducting treatability studies**
    - Requirements for Conducting Treatability Studies
    - Documentation of Treatability Studies