

**Tooele Army Depot-South Area
Attachment 3
Training Plan**

Training Plan

1. General [R315-3-2.5(b)(12), R315-8-2.7]

- 1.1 Employee training at Tooele Army Depot-South Area (TEAD-S or Facility) is crucial to the accomplishment of all the Facility's missions and the requirement to provide environmental training is a top priority. The Permittee shall maintain a 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 as part of the Facility's safety and health program for employees involved in hazardous waste operations. Specific coursework has been outlined for this program, which contains material appropriate for accomplishing these objectives.
- 1.2 This program has evolved into a comprehensive approach to integrating the requirements to the Resource Conservation and Recovery Act (RCRA), Occupational Safety and Health Act (OSHA), the Utah Admin. Code and other regulatory training requirements for meaningful training. The TEAD-S's Training Plan shall contribute to the employees' ability to perform their assigned duties and function in a safe and healthful manner so as not to endanger themselves, other employees, or the environment.

2.0 Scope and Application

- 2.1 All Facility employees shall receive initial training in Hazard Communication. Additionally, employees that are involved in the managing, storage, or handling of hazardous waste at the Facility, including those on temporary appointment, shall be required to complete Hazardous Waste Management training. The types of duties an employee may engage in when dealing with hazardous waste includes, but is not necessarily limited to, engineering, technical work, transportation, containerization, labeling, storage, identification, record keeping, emergency response, and treatment.

3.0 Program Administration

- 3.1 Recordkeeping/Reports/Documentation [Utah Admin. Code R315-8-2.7(a)(2), (d)(1), and (d)(2)]
- 3.2 The Permittee's hazardous waste management training program director is the Environmental Manager and is responsible for supervising the initial training and annual retraining of personnel. The training director shall review and approve the content, method of presentation, and evaluation techniques for all courses developed in support of the Facility's hazardous waste management training program. Each training instructor shall be a subject matter expert in the area of Hazardous Waste Management.
- 3.3 Personnel training shall be documented and the appropriate records shall be maintained in the Facility's Operating Record. Training records for current employees shall be kept until facility closure. Training records of former employees shall be kept for three years from the date that the employee last worked at the facility.
- 3.4 Job Description [Utah Admin. Code R315-3-2.5(b)(12), Utah Admin. Code R315-8-2.7(a)(3), (b), (c), (d)(1), and (d)(2)]

Hazardous Waste Training for new personnel shall be initiated when they start work at the Facility and shall be completed within six months. Personnel shall not be allowed to work

unsupervised until training is completed. New personnel shall not be assigned the responsibility of responding to emergency situations until training in the appropriate responses is completed. As presented in Table 3-1, Hazardous Waste Operations Training Program, the initial training for all Facility employees that are involved in Hazardous Waste operations shall be 5 hours and the annual refresher training shall be 5 hours. Personnel who transfer to Hazardous Waste operations from other areas shall successfully complete the training program within six months of their transfer.

Table 3-1: Hazardous Waste Operations Training Program		
Course	Initial Training	Annual Refresher Training
TEAD-S Hazardous Waste Management and Hazard Communication Course	5 hours	5 hours
Totals:	5 hours	5 hours

The Facility’s training program director shall maintain a list of employees, who are part of the Hazardous Waste Management Training Program. This list shall include the job titles and positions with the name of each employee filling that position. It shall also include a written job description for each position, which shall list the required skills, and hazardous waste management/handling duties that may be required. It shall be the responsibility of the employee’s supervisor or director to notify the training director when an employee is to be added to or removed from the training program.

Employees that have been identified as performing hazardous waste duties shall be provided an update to their job description, which outlines their hazardous waste duties. This description of hazardous waste duties shall be as follows: 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; and/or movement, containerization, storage, identification, recordkeeping, emergency response, treatment, and/or disposition of hazardous waste. Such duties shall require the ability to interpret and implement environmental regulations; knowledge of hazardous waste products and safety regulations; and the skill to effect regulatory requirements and ensure proper management and/or handling of hazardous wastes.

Employees shall successfully complete training in hazardous waste management procedures within six (6) months after the date of appointment to this position and will not work in unsupervised situations until these training requirements have been met. Employees shall also participate in an annual review of this training.

4.0 Emergency Response [Utah Admin. Code R315-8-2.7(a)(3)]

4.1 Emergency response shall be handled in accordance with Attachment 4 (Contingency Plan).

4.2 The Facility training program shall be designed to ensure that facility personnel are able to respond effectively to emergencies. Test exercises that simulate emergencies at the Facility shall be conducted at regular intervals to practice implementation of the various emergency response plans. At the conclusion of each test exercise, a critique session is held to improve the emergency response prior to an actual emergency.

5.0 Course Outlines [Utah Admin. Code R315-3-2.5(b)(12), Utah Admin. Code R-315-8-2.7(a)(2)]

5.1 The Permittee's Hazardous Waste Management Training Program shall consist of one initial training course and an annual refresher course. The course listing shall be as follows:

5.1.1 Tooele Army Depot-South Area Hazardous Waste Management and Hazard Communication Course.

5.2 Each employee in the Facility Hazardous Waste Training Program shall successfully complete the classroom study. Students completing the training course shall sign a Training Attendance Roster which reflects the course title, date and number of hours of training.

5.3 Each employee shall also receive annual refresher training in the above areas.

5.4 The training program is a dynamic program that shall be updated in response to new information and changes in the regulations. Each course outline remains relatively stable but the content shall be revised as necessary to remain current. The following is an outline of the subject matter in each initial and annual refresher-training course along with a brief description of each lesson:

6.0 Hazardous Waste Management Course (Initial and Refresher)

6.1 Utah Admin. Code, RCRA, OSHA, and Army Regulations. This lesson shall be a brief overview of various regulations, water, air, and hazardous materials regulations as well as the permit history, permit training requirements, and the penalties that may be imposed for noncompliance shall also be discussed.

6.2 Hazardous Waste Identification. This lesson shall discuss when a material becomes a hazardous waste, give the definition of F999 and P999, provide a list of various materials that are required to be managed as hazardous waste at the Facility, and requirements of the hazardous waste label.

6.3 Hazardous Waste Management. This lesson shall describe the various information required for the Facility's Operating Record. Additional record keeping requirements, spill or release notification requirements, the permitted storage and process areas at the Facility, hazardous waste movement between these areas, and the forms used to collect hazardous waste treatment and storage information shall be discussed.

6.4 Hazardous Waste Handling Procedures. This lesson shall discuss the selection of proper containers for waste, aisle space requirements in storage areas, and that training for new employees must be completed within six months.

6.5 Waste Analysis. The lesson topics shall include the general requirements of the Waste Analysis Plan, hazardous waste characteristics, laboratory certification, and documentation of waste analysis.

6.6 Maximum Exposure Limits. This lesson shall review the use and selection of proper personal protective equipment (PPE) for the type of work performed.

6.7 New Technologies and Engineering Controls. This lesson shall describe new or alternate technologies at the Facility and how engineering controls are used to prevent worker exposure or reduce worker exposure below permissible exposure limits.

- 6.8 Emergency Response. This lesson shall discuss the implementation of various spill plans: The Installation Spill Contingency Plan (ISCP), the Spill Prevention Control and Countermeasures Plan (SPCCP), and the Emergency Control Plan (ECP). Site sirens, alarms, emergency phone numbers, and individual employee actions for spill notification are also reviewed.
- 6.9 Waste Minimization. This lesson shall discuss waste minimization goals and methods and ideas to minimize the generation of hazardous waste with emphasis on reducing priority, and highly toxic chemicals. The requirements of Executive Orders and other methods of waste minimization such as substitution of less toxic materials and recycling shall be discussed.
- 6.10 SDSs. This lesson shall inform employees of the location of the “Right to Know” centers that contain SDSs and additional safety and emergency response information. A brief review of how to read and understand the information in a SDS is also presented as initial training and a yearly refresher of the OSHA Hazard Communication Standard.

7.0 On-The-Job Training

- 7.1 Facility employees shall receive on-the-job training from their supervisor based on the individual’s job description. The training shall include contingency plan implementation and familiarization with emergency procedures and equipment for the employee’s applicable work area. The supervisor shall also provide training on applicable Standing Operating Procedures (SOPs). Additional on-the-job training shall occur when a new hazardous material is introduced to the work place, or a new procedure is implemented.