

**ATTACHMENT 6**

**PERSONNEL TRAINING PLAN**

## Contents

1.0 Introduction.....	6-2
2.0 Job Titles and Duties [UAC R315-264-16(d)(1 and 2)] .....	6-2
3.0 Training Content, Frequency, and Techniques [UAC R315-264-16(c) and (d)(3)] .....	6-2
3.1 Initial Skills Training for Explosive Ordnance Disposal Personnel .....	6-3
3.2 Upgrade Training for Explosive Ordnance Disposal Personnel .....	6-3
3.3 Qualification Training for Explosive Ordnance Disposal Personnel .....	6-3
3.4 Continuation Training for Explosive Ordnance Disposal Personnel .....	6-3
4.0 Qualification Training [UAC R315-264-16(a)(2), (a)(3), (b), (c), (d)(3), (d)(4), and (e)] .....	6-4
5.0 O&M Personnel Training.....	6-4
6.0 Training Director [UAC R315-264-16(a)(2)] .....	6-4
7.0 Training for Emergency Response [UAC R315-264-16(a)(3)] .....	6-5
8.0 Implementation of the Training Program [UAC R315-264-16(b)].....	6-5
9.0 Training Program Documentation [UAC R315-264-16(d)(4) and (e)].....	6-5

## Tables

<b>Table 1</b>	<b>Job Titles and Duties</b>
<b>Table 2</b>	<b>Facility Personnel Training Matrix</b>
<b>Table 3</b>	<b>Summary of Training Course Content</b>

## **PERSONNEL TRAINING PLAN**

### **1.0 Introduction**

This Attachment outlines training plans for personnel working at the TTU of the UTTR-North Range, in accordance with Utah Administrative Code (UAC) R315-264-16. The TTU is a RCRA treatment, storage, and disposal facility (TSDF).

UTTR-North TTU 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 TTU 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 this Attachment.

The curriculum established for personnel includes handling, storing, and transporting hazardous wastes and complies with training requirements in UAC R315-264-16(a)(3). Employees involved in managing or handling hazardous wastes shall participate in the training. 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.

### **2.0 Job Titles and Duties [UAC R315-264-16(d)(1 and 2)]**

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

### **3.0 Training Content, Frequency, and Techniques [UAC R315-264-16(c) and (d)(3)]**

The training program for personnel working on the TTU managing hazardous wastes combines supervised on-the-job training instruction and formal classroom training. Formal classroom training for each position is listed in Table 2. A summary of the course content is listed in Table 3.

On-the-job training provides the following:

- An introduction to the TTU and its sites, including applicable use restrictions;
- A review of approved TTU hazardous waste management practices and treatment residue handling processes;
- Required documentation;

- Radio and cellular telephone communications at the TTU;
- Use of PPE; and
- Emergency warning and response procedures.

### **3.1 Initial Skills Training for Explosive Ordnance Disposal Personnel**

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. This training consists of classroom and practical training in explosives, explosive effects, and the OB/OD treatment process. Environmental awareness is taught to apprentice trainees and officers at NAVSCOLEOD as part of the EOD curriculum. Facility personnel shall take part in an annual review of the initial training required by Subsection R315-264-16(a).

### **3.2 Upgrade Training for Explosive Ordnance Disposal Personnel**

During upgrade training for EOD personnel 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.

### **3.3 Qualification Training for Explosive Ordnance Disposal Personnel**

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.

### **3.4 Continuation Training for Explosive Ordnance Disposal Personnel**

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

#### **4.0 Qualification Training [UAC R315-264-16(a)(2), (a)(3), (b), (c), (d)(3), (d)(4), and (e)]**

UTTR-North TTU 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 TTU 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. The curriculum established for personnel includes handling, storing, and transporting hazardous wastes and complies with training requirements in UAC R315-264-16(a)(3). Employees involved in managing or handling hazardous wastes shall participate in the training.

#### **5.0 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.

#### **6.0 Training Director [UAC R315-264-16(a)(2)]**

The Unit Environmental Coordinator (UEC) is the training director and is responsible for overseeing the training of the TTU personnel. The training director shall take the courses listed in Section 4.0 as specified in Table 2 of this Attachment.

Qualification training for 775<sup>th</sup> Explosive Ordnance Disposal (EOD) technicians 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. This training is directed by the branch chief, a senior EOD technician, and carried out by EOD training flight staff.

**7.0 Training for Emergency Response [UAC R315-264-16(a)(3)]**

UTTR-North TTU employees receive emergency response training. Drills shall be held annually to familiarize employees with emergency procedures, emergency equipment, and emergency systems, including the emergency evacuation plan and procedures.

**8.0 Implementation of the Training Program [UAC R315-264-16(b)]**

All 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 six (6) months of reporting for duty. Refresher or qualification training is conducted at the intervals prescribed; the minimum being annually.

No employee will work unsupervised with hazardous waste 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 TTU. Formal training programs shall be attended by personnel as required by their duties.

**9.0 Training Program Documentation [UAC R315-264-16(d)(4) and (e)]**

Records documenting the training programs completed by each individual 775<sup>th</sup> Explosive Ordnance Disposal (EOD) technician assigned TTU duties are maintained by the 75 Civil Engineer Group, 775 Civil Engineering Squadron, EOD Flight, HAFB. Copies of these training records are maintained electronically and are accessible from the Oasis EOD office.

Records documenting the training programs completed by non-EOD UTTR personnel are maintained by 75<sup>th</sup> Civil Engineering Group.

The records that document that the training or job experience required by Subsections R315-264-16(a), (b), and (c) has been given to, and completed by, facility personnel shall be maintained by the owner or operator of the UTTR.

Training records on current personnel shall be kept until closure of the facility, and training records of former employees shall be kept for at least three years from the date the employee last worked at the facility.

**Table 1** Job Titles and Primary Duties

<u>Position Title</u>	<u>Primary Duties</u>
<b>TTU OPS WL (Work Leader) (TTU Operations Coordinator (TTUOC)</b>	Responsible for coordinating operations. Schedules TTU Operations and notifies all personnel. Prior to operations, performs TTU/road inspection, verifies weather, verifies ground condition. Assigns operations duties to equipment operators. Conducts incoming/stored vehicle inspections. Conducts safety briefing for all personnel who will be within the explosive arc during the unloading operation and treatment process. Verifies all operations documentation is correct and complete. Functions as equipment operator during cleanup. Coordinates with TTU Operations Team members on any concerns associated with operations.
<b>Move Director/ Rigging Crew</b>	Responsible for asset movement and offload operations. Move director assigns duties for operation. Verifies equipment is ready for the operations. Safety monitor verifies grounds/monitors ESD levels. Rigg munitions for offload operations. Set motor on dunnage and sandbags.
<b>Crane Operator</b>	Responsible for crane and equipment operation. Verifies that crane is ready for the operation the following day. Sets crane up on the TTU pad and inspects/documents operational status of the crane. Operates water truck as needed. Operates crane for offload. Operates equipment during cleanup.
<b>Safety</b>	Responsible for safety compliance. TTU Ops Team member, consulted on safety concerns. Follow operation from start to finish. Verifies safe operations/documents concerns for later discussion.

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**Explosive  
Ordnance Disposal  
(EOD)**

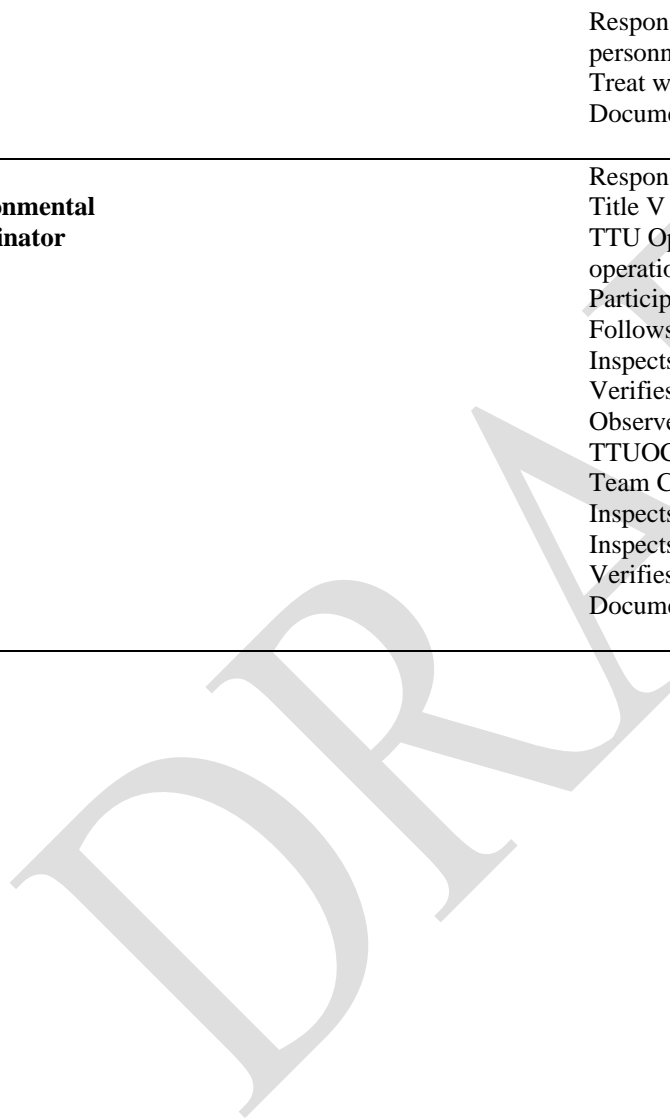
Responsible for treatment of energetic waste.  
Participates in safety briefing.  
Verifies weather and TTU readiness for operation.  
Team leader observes offload operation and verifies waste received is correct and matches manifest  
Team members draw explosives (tools to treat waste) and conduct test burn of fuses at remoter location of TTU  
Responsible for placing explosives on wastes once all personnel have left the TTU.  
Treat waste and verify that the treatment was complete.  
Document the event.

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**Unit  
Environmental  
Coordinator  
(UEC)**

Responsible for Hazardous Waste Operating Permit/ Title V Operating Permit (HWOP/TVOP) compliance.  
TTU Ops Team member- current SME for TTU operations.  
Participates in safety briefing.  
Follows operation from start to finish.  
Inspects TTU prior to operation/consults with TTUOC.  
Verifies permit is followed throughout the operation.  
Observes all aspects of operation and verifies plan with TTUOC, Crane Operator, Move Director, and EOD Team Chief.  
Inspects TTU post operation.  
Inspects TTU post cleanup.  
Verifies completeness of documentation for operation.  
Documents operations in various tracking tools.

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**Table 2** TTU Personnel Training Matrix

Training Course	Frequency	Job Title					
		TTU/OC	Crane Operator	Move Director Rigger	Safety	UEC	EOD
1) UTTR UXO/Explosive Safety	Annual	•	•	•	•	•	
2) RCRA/TVOP (Title V Operating Permit) Awareness	Annual	•	•	•	•	•	
3) 40 Hour HAZWOPPER <sup>1</sup>	Initial	•	•	•	•	•	See Note 2
4) 8 Hour HAZWOPPER Refresher	Annual	•	•	•	•	•	See Note 2
5) EOD Environmental Compliance Training	Annual						•

Notes:

<sup>1</sup> 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.

<sup>2</sup> EOD technical schools, annual, and monthly EOD training requirements meet the intent of 40-hr/8-hr HAZWOPER training.

**Table 3** Summary of Training Course Content

<b>Training Course</b>	<b>Course Content Includes:</b>
1) UTTR UXO/Explosive Safety  Reoccurrence: Annual  Documented via: Attendance Tracking Roster	<ul style="list-style-type: none"> <li>● Range Environment and Personal Safety</li> <li>● Wildlife on the Range</li> <li>● Explosive Safety</li> <li>● UXO Recognition and Safety</li> <li>● RF and Laser Safety</li> <li>● Range Concerns</li> <li>● Driving on the Range</li> <li>● Radio Clearance Procedures</li> <li>● Photo Policy</li> <li>● Dugway Proving Ground Concerns</li> <li>● Important Phone Numbers</li> </ul>

**Table 3** Summary of Training Course Content

Training Course	Course Content Includes:
<p>2) RCRA/TVOP Awareness</p> <p>Reoccurrence: Annual</p> <p>Documented via: Attendance Tracking Roster</p>	<ul style="list-style-type: none"> <li>● Missile Storage Area (MSA) Rules               <ul style="list-style-type: none"> <li>○ 90 Day Rule, Military Munitions Rule</li> <li>○ 30 Day Rule, HWOP, Module 7, VII.A.2.</li> </ul> </li> <li>● TTU Operations               <ul style="list-style-type: none"> <li>○ Fugitive Dust Mitigation Plan</li> <li>○ Class II Landfill Permit</li> <li>○ Sound Monitoring Program</li> <li>○ Disposal History</li> <li>○ Types of propellants treated at the TTU (1.1 and 1.3)</li> <li>○ Sites where OB/OD operations take place</li> <li>○ Overview of TTU cleanup operations</li> <li>○ TTU Hazards (soil and air contaminants)</li> </ul> </li> <li>● Overview of RCRA Permit               <ul style="list-style-type: none"> <li>○ Operational limitations under RCRA Permit</li> <li>○ Maximum OB/OD amounts per event</li> <li>○ Maximum OB/OD annual amount</li> <li>○ Noise modeling for detonations</li> <li>○ Wind speed, direction and visibility limitations</li> <li>○ Detonations occur during daylight hours only</li> </ul> </li> <li>● Overview of Title V Permit               <ul style="list-style-type: none"> <li>○ Maximum OD lbs of NEW per day</li> <li>○ Maximum OD lbs of NEW per year</li> <li>○ Sound modeling for detonations greater than 10,000 lbs NEW</li> <li>○ No detonations during dark hours</li> <li>○ No detonation shall occur after December 19 or before February 22 of any year</li> <li>○ No open burning of any waste containing beryllium or other highly toxic materials</li> </ul> </li> </ul>

**Table 3** Summary of Training Course Content

Training Course	Course Content Includes:
3) HAZWOPER - IAW 29 1910.120  (40 hour initial)  Reoccurrence: Initial  Documented via: Attendance Roster or Certificate of Completion	<ul style="list-style-type: none"> <li>● CFR 29 1910.120 (p): Operations under RCRA</li> <li>● CFR 29 1910.120 (q): Emergency response to releases</li> <li>● CFR 29 1910.120 (q): Levels               <ul style="list-style-type: none"> <li>(i) First Responder Awareness level;</li> <li>(ii) First Responder Operations level;</li> <li>(iii) Hazardous Materials Technician;</li> <li>(iv) Hazardous Materials Specialist;</li> <li>(v) On Scene Commander</li> </ul> </li> </ul>

**Table 3** Summary of Training Course Content

Training Course	Course Content Includes:
<p>4) HAZWOPER - IAW 29 1910.120</p> <p>(8 hour annual refresher)</p> <p>Reoccurrence: annual</p> <p>Documented via: Attendance Roster or Certificate of Completion</p>	<ul style="list-style-type: none"> <li>● CFR 29 1910.120 (p): Operations under RCRA</li> <li>● CFR 29 1910.120 (q): Emergency response to releases</li> <li>● CFR 29 1910.120 (q): Levels               <ul style="list-style-type: none"> <li>(i) First Responder Awareness level;</li> <li>(ii) First Responder Operations level;</li> <li>(iii) Hazardous Materials Technician;</li> <li>(iv) Hazardous Materials Specialist;</li> <li>(v) On Scene Commander</li> </ul> </li> </ul>

**Table 3** Summary of Training Course Content

Training Course	Course Content Includes:
<p>5) EOD Environmental Compliance</p> <p>Reoccurrence: Initial (within 6 month) and Annual</p> <p>Documented via: EOD electronic training trackers/records</p>	<ul style="list-style-type: none"> <li>● Overview of RCRA</li> <li>● Military Munitions Rule</li> <li>● Overview of 40 CFR Parts 260, 261, 262, 263, 264, 265, 266 and 270</li> <li>● Record Keeping</li> <li>● TTU Description</li> <li>● TTU Procedures</li> <li>● UTTR Procedures</li> <li>● On Base Response</li> <li>● Off Base Response</li> <li>● AF-MAN 32-3001 Guidance</li> <li>● EOD Munitions Turn-in from EMER (EOD Explosive and Munitions Emergency Response)</li> <li>● Transporting Explosives</li> </ul>