

ATTACHMENT 8
PERSONNEL TRAINING REQUIREMENTS
(PERMIT APPLICATION SECTION 14)

14.0 § 270.14(b)(12) – Training Plan

This personnel training plan has been developed to assure that those WSTF employees involved with hazardous waste treatment, storage, and disposal receive adequate training in the proper procedures relevant to their job responsibilities per § 264.16(a). Records that reflect this training will be maintained in office files by the contractor Environmental Department and electronically in the WSTF Training Database (WTDB) per § 264.16(d)(4) and § 264.16(e). In addition, an ICS will be utilized for responses to emergency releases and spills per Attachment Q of the EPP. The WSTF Fire Department will be responsible for training first responders, hazardous materials technicians, and on-scene incident commanders per § 264.16(a)(3). ICS records will be maintained in the contractor emergency services organization office files and electronically in the WTDB per § 264.16(d)(4) and § 264.16(e). Parts of this plan contain a descriptive outline for training courses and job titles and job descriptions/responsibilities for employee positions.

14.1 Training Program

WSTF has developed a series of training modules which are taught by facility qualified persons, trained in hazardous waste management procedures. These modules have been developed to assure that employees involved in WSTF's hazardous waste management activities receive adequate training to perform their job duties in compliance with all relevant Federal and State regulations. Records for each employee include certification of completion and documentation for each course.

Individual training programs will be supplemented with private and public sector courses when necessary. The Environmental Training Coordinator evaluates and makes determinations for supplemental training. Consideration will be given for material not covered by those training modules outlined in this plan.

14.2 Training Modules

The training program is based on the training modules outlined in this plan and listed in Table 14.1. These modules are taught as classroom sessions by facility qualified persons, trained in hazardous waste management procedures. Where applicable, classroom training is supplemented and/or substituted with on-the-job training. Approved on-the-job training is documented by the Environmental Training Coordinator and a record is maintained in personnel records.

Table 14.1 WSTF Training Modules

#1	Chemical Safety
#2	RCRA Regulations
#3	WSTF Environmental Procedures
#4	WSTF Contingency Plan
#5	200/500 Area Evaporation Tank/Fuel Treatment Unit
#6	Propellant Contaminated Waste Streams Handling
#7	Hazardous Waste Container Handling
#8	Hazardous Waste Shipments
#9	Waste Analysis Plan

14.3 Training Module Outlines

The following outlines briefly describe the type of material covered in the individual training modules. These outlines are modified periodically to remain current with experience and regulatory changes, keeping the protection of human health and the environment as the ultimate priority.

14.3.1 Training Module #1 - Chemical Safety

- I. Chemical and Physical Hazards
 - A. Reactivity
 - B. Corrosivity
 - C. Toxicity
 - D. Combustibility
 - E. Flammability
 - F. Explosivity
 - G. Pressure
- II. Health Hazards
 - A. Body Response
 - 1. Respiratory Tract
 - 2. Skin
 - 3. Eyes
 - 4. Central Nervous System
 - 5. Liver
 - 6. Kidneys
 - 7. Blood
 - 8. Reproductive System
 - B. Exposure Guidelines
 - 1. American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Values (TLV's)
 - a. TLV-Time Weighted Average (TWA)
 - b. TLV-Short-Term Exposure Limit (STEL)
 - c. TLV-Ceiling (WSTF considers the TLV-TWA as the TLV Ceiling)
 - 2. Occupational Safety and Health Administration
 - 3. National Institute for Occupational Safety and Health
- III. Hazard Communication - 29 CFR, Part 1910
 - A. Labeling Requirements
 - B. Material Safety Data Sheets
 - 1. Identity of Hazardous Chemicals
 - 2. Physical and Chemical Characteristics
 - 3. Physical Hazards
 - 4. Health Hazards
 - 5. Primary Route of Entry
 - 6. Exposure Limits
 - 7. Carcinogenicity
 - 8. Handling Instructions
 - 9. Control Measures
 - 10. Emergency and First Aid Procedures
 - 11. Date of Prep

- 12. Name, address, phone of manufacturer
- C. Exceptions
 - 1. Retail Products
 - 2. Office Products
- D. WSTF contractor Environmental Department Procedure - "Hazardous Communications"

14.3.2 Training Module #2 - RCRA Regulations

- I. Background
 - A. Behavior of Chemicals in the Environment
 - 1. Introduction
 - 2. Dispersion Pathways
 - a. Ignitability
 - b. Corrosivity
 - c. Reactivity
 - d. Toxicity Characteristic Leaching Process
 - 3. Fate of Chemicals in the Environment
 - a. Nonpersistent chemicals
 - b. Persistent chemicals
 - B. Resource Conservation and Recovery Act - 1976; 40 CFR, Parts 260-280
 - 1. Environmental Protection Agency and Act background
 - 2. New Mexico Environment Department - New Mexico Hazardous Waste Management Regulations
 - 3. Cradle-to-Grave Responsibility
 - 4. 1984 Hazardous and Solid Waste Amendments Waste Minimization Requirements
- II. Regulations
 - A. Identification of Hazardous Waste
 - 1. Characteristic Hazardous Waste
 - a. Ignitability
 - b. Corrosivity
 - c. Reactivity
 - d. Toxicity Characteristic Leaching Process (TCLP)
 - 2. Listed Hazardous Waste
 - a. Non-specific sources (F Wastes)
 - b. Specific sources (K Wastes)
 - c. Discarded commercial chemical products
 - i. Acutely toxic wastes (P wastes) triple rinsing required
 - ii. Toxic wastes (U wastes)
 - B. Generators of Hazardous Wastes
 - 1. Quantity Exclusion
 - 2. Manifest
 - a. Tracking document for hazardous waste
 - b. Legal responsibility for information
 - c. Generator signature (NASA)
 - 3. Packing, labeling, marking, placarding
 - 4. Accumulation time
 - 5. Biennial Report
 - C. Transporters of Hazardous Wastes
 - D. Treatment, Storage, and Disposal Units for Hazardous Wastes
 - 1. Evaporation Tank Unit
 - 2. Waste Fuel Treatment Unit

3. 90- Day Container Storage Facility
 4. Contingency Plan (Emergency Preparedness Plan)
- E. Enforcement Actions
1. Personal Criminal Liability
 2. Revocation of Generator's I.D.

14.3.3 Training Module #3 - WSTF Environmental Procedures

- I. Contractor Environmental Department
- A. Background
 - B. Present Objectives (The WSTF Environmental Management System's commitment)

II. Environmental Procedures

A. Solid Waste (Trash) Disposal in Dumpsters for Transfer Off-site

1. Purpose and Scope
 - a. Outline operating procedures for NASA/WSTF dumpsters
 - i. Hazardous waste as defined in 40 CFR, Part 261
 - ii. Salvageable materials for recycling
 - iii. Items unsuitable for dumpsters

2. Summary

- a. Operated by Technical Support Department
- b. No liquids or sludge
- c. No scrap metal (including barrels)
- d. No concrete or asphalt
- e. No batteries (alkaline/carbon-zinc batteries exception)
- f. No hazardous waste
- g. No burning
- h. RCRA empty poly containers (five gallons or more) cut up or crush to prevent reuse
- i. Questions -contact WSTF contractor Environmental Department

NOTE: To prevent pollution and maximize landfill space evaluate waste minimization and recycling opportunities

B. Waste Tracking

1. Purpose and Scope
 - a. Provide communication mechanism for generating department to inform contractor Environmental Department of new, existing, or changing waste streams
 - b. Maintenance of database for all NASA/WSTF waste streams
2. Summary
 - a. Generating department completes a WSTF Individual Waste Profile Sheet (WIWPS) for all of their waste streams
 - b. WSTF contractor Environmental Department
 - i. Identifies regulatory status of waste stream
 - (a) Hazardous waste
 - (b) Non-regulated hazardous constituent waste
 - (c) Non-regulated solid waste
 - ii. Recommends proper disposal
 - c. Annual review with generator of all waste streams

C. Hazardous Waste Collection

1. Purpose and scope
 - a. Implement procedures for the proper accumulation of hazardous waste and specific non-hazardous wastes by the generating departments
 - b. Operation and maintenance of satellite accumulation areas
 - c. Provide tracking mechanism for wastes from generation point to ultimate disposal
2. Summary

- a. Wastes to be accumulated in satellite accumulation areas
 - b. Waste containers will be numbered
 - c. Waste will be logged when added to container
- D. Disposal of Spent Batteries
- 1. Purpose and Scope - Define Procedures for Disposal of Various types of batteries used at NASA/WSTF
 - 2. Summary
 - a. Alkaline batteries - (non-rechargeable) recycle in area containers, (rechargeable) dispose of as hazardous waste
 - b. Carbon-zinc batteries – ensure that they contain no mercury per appropriate MSDS
 - c. Lead-acid batteries
 - i. Do not drain
 - ii. Warehouse – for recycle
 - iii. Purchase with core exchange when possible
 - d. Mercury batteries - hazardous waste disposal
 - e. Nickel-cadmium batteries
 - i. Flashlight size - hazardous waste disposal
 - ii. Large size
 - (a) Drain
 - (b) Hazardous waste disposal
 - f. Lithium batteries – reactive, hazardous waste disposal by deactivation
 - g. Silver-oxide batteries - hazardous waste disposal
 - h. Unidentified batteries - contact the WSTF contractor Environmental Department
- E. Collection and Disposal of Used Oil (non-hazardous oil is recycled)
- 1. Purpose and Scope
 - a. Provide proper procedures for collection of used oil at NASA/WSTF
 - b. Assure hazardous waste oil is segregated from nonhazardous waste oil
 - 2. Summary
 - a. Used oil that is not “Hazardous Waste” will be collected and handled separately from used oil that is “Hazardous Waste”
 - b. Oil will be collected in waste accumulation areas according to hazardous waste collection procedure
 - c. The contractor Environmental Department will arrange for recycle/reclamation of nonhazardous used oil
 - d. WSTF contractor Environmental Department will arrange for disposal of hazardous used oil
- F. Waste Explosives Disposal
- 1. Purpose and Scope - Provide for proper disposal of explosives
 - 2. Summary
 - a. WSTF Ordnance Officer will identify and dispose of all waste explosives at NASA WSTF
 - b. Disposal will occur at an off-site permitted disposal facility
- G. Operation of the Hazardous Waste - 90-day Container Storage Facility
- 1. Purpose and Scope - Define procedures for the operations of the Container Storage Facility
 - 2. Summary
 - a. All transportation of hazardous waste will be performed by certified hazardous waste handlers
 - b. Doors will be kept locked; keys will be controlled by the WSTF contractor Environmental Department
 - c. No waste will be stored outside the facility
 - d. Container movement and waste transfers will follow the proper WSTF procedures
 - e. Containers will be labeled “Hazardous Waste”, marked with the accumulation start date and inspected once a week
 - f. Delivery of hazardous waste may be coordinated through the WSTF contractor Environmental Department

14.3.4 Training Module #4 - WSTF Contingency Plan

(Emergency Preparedness Plan)

- I. Purpose
 - A. Protect human health and the environment
 - B. Prevent and control discharges to the environment
 - C. Identify resources to be used to respond to discharges
 - D. Outline response activities in the event of an emergency
 - E. Reporting spills as required
- II. Responsibilities
 - A. Emergency Planning Coordinator (EPC)
 - 1. Provide site-wide coordination
 - 2. Provide guidance to emergency responders
 - 3. Provide the Environmental Program Manager accurate information for reporting to regulatory agencies
 - B. Incident Commanders
 - 1. Directs response activities in emergencies
 - 2. Coordinates activities at emergency site
- III. Emergency Procedures
 - A. General
 - 1. Notification
 - 2. Risk evaluation
 - 3. Control of immediate situation
 - 4. Clean up activities
 - B. Releases from Units
 - 1. Evaporation Tank Unit
 - 2. Waste Fuel Treatment Unit
 - C. Response Procedures Resulting from Unit Releases (Appendix Q of Emergency Preparedness Plan)
 - 1. Evacuation Plan
 - 2. Fires and explosions
 - 3. Containment activities
 - 4. Spill clean-up
 - 5. Decontamination procedures
 - D. Emergency and Monitoring Equipment
 - 1. Procedures for use
 - 2. Inspection
 - 3. Repairing and replacement

14.3.5 Training Module #5 - Evaporation Tank Unit/Fuel Treatment Unit

Evaporation Tank Unit

- I. System Design
 - A. Tanks
 - 1. Construction
 - 2. Capacity and warning devices
 - 3. Secondary containment and leak detection
 - B. Drain Lines
 - 1. Construction

2. Layout
 - a. Sources
 - b. Valves
 3. Secondary containment and leak detection
- C. Drain Line Sump
1. Construction
 2. Capacity and warning devices
 3. Secondary containment and leak detection
- II. Operation at Sources
- A. General
1. Insure a profile sheet exists for the type of waste going into the hazardous waste sink drains
 2. Use drains only for approved waste streams
- B. Clean Room
1. Lab Con high bay cleaning pad with floor drain to evaporation tanks
 - a. For cleaning large items
 - b. Caustics, acids, and water drained (some solvents at low VOCs that meet Subtitle CC regulations)
 - c. Containerized waste that is profiled may be drained into the system at the floor drain
 2. Indoor cleaning tanks
 - a. Tanks hold caustic and acidic solutions
 - b. Solutions reused as much as possible
 - c. When drained into system, caustics and acids are not drained on same day and are cooled with site water
- C. Chemistry Laboratory - Log hydrazine(s) waste drain discharges
- D. Metallurgy Laboratory
- III. Secondary Containment Systems
- A. Inspections – The contractor Environmental Department will conduct daily inspections of the evaporation tanks, the drain lines (with associated sinks), and the drain line sump secondary containment systems
- B. Liquids Observed in Secondary Containment Systems
1. Notify contractor Environmental Department immediately
 2. Leak observed in:
 - a. Tank
 - i. Switch drain line to non-leaking tank
 - ii. Pump fluid from leaking tank into non-leaking tank
 - iii. Using appropriate safety gear, repair leak
 - iv. Certify repairs using an independent, registered, professional engineer
 - b. Drain Lines and Drain Line Sump
 - i. Inform personnel that hazardous waste drain lines will be closed (specify specific area)
 - ii. Isolate leaking section or component
 - iii. Remove and repair leaking pipe/sump
 - iv. Certify repairs -independent, registered, professional engineer
 - v. Return lines/sump to normal use mode
- IV. Drain Line Valve Operation
- A. Mark valves
1. When closing normally opened valves, affix tag with name of responsible person, the time, and the date.
 2. When opening normally closed valves, affix tag with name of responsible person, the time, and the date.
 3. Mark tank valves with time of initiating operation
- B. Log all operations on drain lines
1. Logbook maintained by contractor Environmental Department
 2. All operations require documentation in the contractor Environmental Department Operating Record
- C. Inform Area When Lines Are Closed

1. When an operation requires section(s) of drain lines to be closed, notify Area waste generators
2. Area notification can occur through paging system or **Do Not Operate Tags**
3. After line is repaired, notify Area that lines are operational

Fuel Treatment Unit

I. System Design

- A. Tanks
 1. Construction
 2. Capacity and sight glasses
 3. Secondary containment
- B. Piping and Pumps
 1. Construction
 2. Layout
 - a. Sources
 - b. Valves
 - c. Emergency cutoff and shutoffs
 - d. Secondary containment and leak detection

II. Operation

- A. General Operation
 1. All operations will be performed by certified hazardous waste handlers
 2. All transportation of hazardous waste will be performed by certified hazardous waste handlers
 3. Gates will be kept locked; keys will be controlled by the WSTF contractor Environmental Department
 4. All fuel waste must be sampled and be <10% prior to acceptance for storage
 5. Delivery of hazardous waste must be coordinated through the WSTF contractor Environmental Department
 6. Waste profile sheets must exist for all entering waste streams

III. Secondary Containment

- A. Inspections - The contractor Environmental Department will conduct daily and weekly inspections of the storage tanks, all piping, and the secondary containment holding areas.
- B. Liquids Observed in Secondary Containment Systems
 1. Notify contractor Environmental Department immediately
 2. Leak observed in:
 - a. Tank
 - i. Switch to non-leaking tank
 - ii. Pump fluid from leaking tank into non-leaking tank
 - iii. Using appropriate PPE, repair leak
 - iv. Certify repairs using an independent, registered, professional engineer
 - b. Piping/Pumps
 - i. Inform generation personnel that FTU will be closed
 - ii. Isolate leaking section or component
 - iii. Using appropriate PPE, remove, replace, repair leak/pump
 - iv. Certify repairs - independent, registered, professional engineer
 - v. Return lines to normal use mode
 3. Area notification by use of **Do Not Operate Tags**
 4. After line is repaired, remove the tags

14.3.6 Training Module #6 - Propellant Contaminated Waste Stream Handling

- I. Chemical Review (MSDS)
 - A. Fuels

1. Hydrazine
2. Methyl hydrazine (MMH)
3. Unsymmetrical dimethylhydrazine (UDMH)
4. Aerozine-50 (A-50)
5. Hydrogen
- B. Oxidizers
 1. Nitrogen tetroxide
 2. Liquid oxygen
- II. Personal Protective Equipment
 - A. Totally Encapsulated Suits
 - B. Hydrazine and Oxidizer Interscans Training and Use for Operations
- III. Waste Treatment/Storage Process Systems
 - A. Fuel Storage Facility
 1. Definition
 2. Exemptions
 - B. Fuel Vent Treatment Tanks
 1. Design
 2. Operation
 - C. Aspirators
 1. Design
 2. Operation
 - D. Decontamination Stations
 1. Design
 2. Operation
- IV. Shipment of Waste Propellant Off-site
 - A. Fuel
 1. Container restrictions
 2. Disposal or disposal costs
 - B. Oxidizer
 1. Container restrictions
 2. Disposal or disposal cost

14.3.7 Training Module #7 - Hazardous Waste Container Handling

- I. Chemical Safety Review of Module #1
- II. Regulations
 - A. Container Definition
 - B. Satellite Accumulation
 - C. 90-Day Storage Restriction
 - D. 90-Day Storage Facility
 1. Design
 - a. Secondary containment
 - b. Emergency alarm
 - c. Capacity
 2. Operation
 - a. Logbook
 - b. All movement inspected by hazardous waste inspectors
 - c. Aisle space
 - d. Waste segregation

- III. Waste Container Movement/Transfer
 - A. Proper Equipment
 - 1. Hand truck
 - 2. Forklift
 - 3. Bung wrench (non-sparking)
 - 4. Lift-gate truck
 - 5. Radio
 - B. Safety and Safety Equipment
 - 1. Reference the pertinent Job Hazard Assessment
 - 2. Gloves, hardhat, or foot protection
 - 3. Splash gear, SCBA, totally encapsulated suit, apron, or coveralls
 - 4. Face shield and goggles
 - C. Procedure
 - 1. Notify contractor Environmental Department
 - 2. Using appropriate equipment, load container into transport truck, retrieve logbook for container
 - 3. Radio contact/two-man operation required during operation
 - 4. Transport waste to appropriate area
 - 5. Using appropriate equipment, unload container
 - 6. Turn logbook for container into WSTF contractor Environmental Department

14.3.8 Training Module #8 - Hazardous Waste Shipments

- I. Packaging and Labeling
 - A. DOT Requirements - 49 CFR
 - B. EPA Requirements - 40 CFR
 - C. Hazardous Waste Labeling
- II. Uniform Hazardous Waste Manifest
 - A. General
 - 1. Tracking document for all hazardous waste from “cradle-to-grave”
 - 2. Legal liabilities
 - B. Generator
 - C. Waste Description
 - D. Hazard Class
 - E. Quantities
 - F. Special Handling Notes
 - G. Signature
- III. Placarding of Transport Trucks
- IV. Coordination On Site
 - A. Contractor Environmental Department
 - B. Purchasing Department
 - C. Warehouse

14.3.9 Training Module #9 - Waste Analysis Plan

- I. Scope
 - A. Definitions
 - 1. Regulated hazardous wastes
 - 2. Non-regulated wastes with hazardous waste constituents
 - B. Wastes Covered - Regulated Hazardous Wastes

II. Generation Information

- A. Physical Description
- B. Specific Gravity
- C. Ignitability
- D. Composition
- E. pH

III. Management Analyses

- A. Fingerprint Analysis
 - 1. Parameters
 - a. Physical description
 - b. Specific gravity
 - c. pH
 - 2. Frequency checked
 - a. Evaporation Tank Unit
 - b. 55 gal. annually or more
 - c. Other critical wastes
- B. Evaporation Tank Unit Analysis
 - 1. Parameters
 - 2. Frequency
- C. Additional Analyses Could be Requested or Required
- D. Analytical Methods
 - 1. Sources
 - a. EPA-SW846
 - b. American Society of Testing Materials (ASTM)
 - c. WSTF laboratory job instruction
 - 2. Methods must be accepted by regulatory agencies
- E. Sampling
- F. QA/QC Program

14.3.10 Introductory and Refresher Training

Each employee covered by the plan will receive training in those training modules relevant to his or her job responsibilities. New employees complete training within six months of their effective date of employment, or within six months after being given a new assignment or reassigned position. New employees are closely supervised and work closely with a trained technician for the first 6 months of their new assignments.

Annual refresher training courses are required for each employee assigned to hazardous waste management and handling activities. Selection of the appropriate refresher training course(s) for each employee will be customized to his or her particular work activities. The Environmental Training Coordinator will make a determination of which courses will be required. The preceding introductory and refresher information is included to satisfy the requirements of § 264.16 (b-c).

14.3.11 Employee Job Descriptions

This section details job titles, job descriptions/responsibilities, and minimum course training requirements for those positions connected with hazardous waste management per § 264.16(d)(1-3).

***NOTE:** Minimum qualifications may be waived at the option of management if, in their judgment, there exists equivalents to stated requirements.

14.3.11.1 Environmental Program Manager (EPM)

Minimum Qualifications*

1. Education: four year degree from accredited college or university
2. Experience: five year, minimum two years in environmental compliance

Responsibilities

1. Establish and ensure implementation of the WSTF Environmental Compliance Program (compliance with all State and Federal requirements)
2. Direct the technical activities of the WSTF support contractor Environmental Department
3. Manage overall site environmental budget
4. Manage site environmental compliance projects
5. Coordinate the Environmental Compliance Program with off-site organizations including the USEPA, New Mexico Environment Department, and White Sands Missile Range
6. Serve as the primary point of contact on matters of environmental regulations, policy, programs, and release reporting
7. Review, coordinate, and approve all operating procedures and work authorization documents issued by the WSTF contractor Environmental Department
8. Be responsible for the submission of all permit applications as required by environmental regulations
9. Be responsible for providing interpretations of environmental laws and regulations

Minimum Training Requirements

Training Module #4 (Contingency Plan/Emergency Preparedness Plan), (Table 14.1) and the current WSTF Waste Management Procedur

14.3.11.2 Emergency Planning Coordinator (EPC)

Minimum Qualifications*

1. Education: four year degree from accredited college or university in science or engineering
2. Experience: one year minimum

Responsibilities

1. Advise the NASA WSTF Manager on emergency matters. The EPC has the primary responsibility for emergency management planning activities for the NASA Manager
2. Maintain the Emergency Operations Center (EOC) in an operating mode at all times or be able to easily convert the EOC area into an operating condition
3. Direct and control the EOC during its activation
4. Advise the Executive Group of emergency status and update as required
5. Analyze the emergency skills needed by the facility and identify the training necessary to provide those skills
6. Ensure a resource inventory is prepared and maintained
7. Serve as day-to-day liaison between WSTF and local emergency management organizations, including organized emergency volunteer groups and private agencies
8. Inform the NASA WSTF Manager of preparedness status and anticipated needs
9. Be responsible for insuring that environmental considerations are integrated into all WSTF emergency plans

Minimum Training Requirements

Training Module #4 (Contingency Plan/Emergency Preparedness Plan), (Table 14.1) and the current WSTF Waste Management Procedure

14.3.11.3 Contractor Environmental Department Supervisor

Minimum Qualifications*

1. Education: four year degree from an accredited college or university
2. Experience: three year minimum

Responsibilities

1. Provide interpretation, direction, and guidance to all WSTF organization elements on compliance with environmental laws and regulations
2. Review and evaluate all current and proposed activities for conformance with prescribed policy, standards, and procedures; recommend necessary actions to obtain compliance; conduct annual audits to insure WSTF compliances with all environmental regulations
3. Be responsible for the shipment of hazardous waste to off-site RCRA disposal facilities; shall develop and implement a plan to periodically inspect all off-site disposal facilities used by WSTF for compliance with Federal and State environmental laws and regulations
4. Be responsible for operation of RCRA permitted units that support overall site operations including Waste Accumulation Areas, the 90 Day Container Storage Facility, the Evaporation Tank Unit, and the Fuel Treatment Unit
5. Prepare procedures to implement the Environmental Compliance Program after coordinating these procedures with the cognizant organizations
6. Prepare and implement a waste minimization plan
7. Develop and implement an environmental training program for site personnel that complies with all environmental laws and regulations
8. Ensure that the regulatory required inspections of WSTF's facilities and activities as a hazardous waste treatment, storage, and disposal facility are performed and files are maintained
9. Oversee the treatment and disposal of waste explosives; coordinate with the WSTF Ordnance Officer as required
10. Prepare and update environmental permit applications as required
11. Disseminate information on environmental matters to provide organizations sufficient information comply with the prescribed laws and regulations

Minimum Training Requirements

Training modules #2, #3, #4, #8, and #9 (Table 14.1)

14.3.11.4 Environmental Engineer/Scientist

Minimum Qualifications*

1. Education: four year degree from an accredited college or university
2. Experience: one year technical background

Responsibilities

1. Perform duties as directed by WSTF contractor Environmental Department Supervisor

2. Assist WSTF contractor Environmental Department Supervisor in fulfilling the responsibilities outlined in the above job description (See job description for the contractor Environmental Department Supervisor)
3. Perform required inspections of WSTF's facilities and activities as a hazardous waste treatment, storage, and disposal facility
4. Maintain office files of required inspections for a minimum of three years

Minimum Training Requirements

Training modules #1 through #9 (Table 14.1)

14.3.11.5 Environmental Training Coordinator

Minimum Qualifications*

1. Education: four year degree from an accredited college or university
2. Experience: one year

Responsibilities

1. Develop, implement, and/or supervise the environmental training programs for site personnel that complies with all environmental laws and regulations
2. Maintain office files to document environmental training program
3. Review, no less than annually, contractor emergency service organization training records that apply to hazardous waste response

Minimum Training Requirements

Attendance at an annual course, seminar or meeting which covers environmental compliance, hazardous material incident response, or environmental training

14.3.11.6 Hazardous Waste Shipment Coordinator

Minimum Qualifications*

1. Education: High school degree
2. Experience: one year minimum

Responsibilities

1. Coordinate off-site shipments of hazardous waste
2. Assure analysis is accomplished for WSTF waste streams sent off-site for disposal and maintain current waste profiles
3. Act as contact point for off-site hazardous waste disposal shipments, assisting with transportation logistics
4. Prepare all requisite paperwork for hazardous waste shipments including, but not limited to, the uniform hazardous waste manifest
5. Respond to any discrepancies found on the uniform hazardous waste manifest for WSTF shipments
6. Assure transporter's truck is adequately placarded, loaded, manifested, and does not exceed legal weight limits
7. Provide escort for all hazardous waste transporters while at WSTF

Minimum Training Requirements

Training modules #1, #2, #3, #4, and #8 (Table 14.1)

14.3.11.7 Hazardous Waste Handler

Minimum Qualifications*

1. Education: High school degree
2. Experience: one year minimum

Responsibilities

1. Transfer on site containers of wastes
2. Initiate contingency plan in the event of a spill
3. Sampling of hazardous wastes

Minimum Training Requirements

Training modules #1, #2, #3, #4, and #7 (Table 14.1)

14.3.11.8 Hazardous Waste Sampler

Minimum Qualifications*

1. Education: High school degree
2. Experience: one year minimum

Responsibilities

1. Sampling of all WSTF contamination assessment and monitoring wells
2. Use appropriate USEPA approved analytical methods for sample
3. Coordinate analysis of hazardous waste samples
4. Prepare samples for either on-site analysis or off-site-shipment

Minimum Training Requirements

Training modules #1, #2, #3, #4, and #9 (Table 14.1)

14.3.11.9 First Responder Operations

Minimum Qualification*

1. Education: High School degree
2. Experience: Fire Fighter I trained in First Responder Awareness

Responsibilities

1. Perform initial response to hazardous waste releases to protect life, the environment, and/or property
2. Use basic hazard and risk assessment techniques
3. Selects proper personal protective equipment
4. Practices basic control, containment, and/or confinement operations
5. Exercise decontamination and termination techniques

Minimum Training Requirements

HAZWOPER First Responder Operations equivalent to OSHA 1910.120 and Training Module #4 (Table 14.1)

14.3.11.10 Hazardous Materials Technician

Minimum Qualification*

1. Education: High School degree
2. Experience: Fire Fighter I trained in First Responder Operations

Responsibilities

1. Perform response to hazardous waste releases to protect life, the environment, and/or property
2. Know the ICS and function within the assigned roles
3. Use basic hazard and risk assessment techniques
4. Understand basic chemical behavior, toxicology, and related terminology
5. Selects proper personal protective equipment
6. Practices basic control, containment, and/or confinement operations
7. Recover and cleanup released wastes
8. Exercise decontamination and termination techniques

Minimum Training Requirements

40 Hour HAZWOPER Hazardous Materials Technician equivalent to OSHA 1910.120 requirements and Training Module #4 (Table 14.1)

14.3.11.11 On-Scene Incident Commander

Minimum Qualification*

1. Education: High School degree
2. Experience: Fire Fighter I trained as a Hazardous Materials Technician

Responsibilities

1. Implement the WSTF emergency response plan
2. Coordinate activities during an emergency response
3. Notify the Environmental Program Manager when hazardous materials/wastes are released to the environment
4. Commit necessary site resources (equipment and manpower) to mitigate emergency situations
5. Conduct practical exercises

Minimum Training Requirements

On-scene Incident Commander qualification equivalent to OSHA 1910.120 requirements and Training Module #4 (Table 14.1)