

PERMIT ATTACHMENT J PERSONNEL TRAINING

Introduction

Holloman Air Force Base (**HAFB**) personnel that manage and store hazardous wastes shall successfully complete a program of classroom instruction and/or on-the-job training to prepare them to operate and maintain the Container Storage Unit (**CSU**) in a safe manner and ensure the Facility's compliance with New Mexico Hazardous Waste Management Regulations 20 NMAC 4.1. No employee shall work unsupervised until he/she has completed either the formal training course or equivalent on-the-job training. This training shall be completed within six months of assignment to working with hazardous waste at the CSU.

Defense Re-utilization Marketing Service (**DRMS**) Headquarters offers a complete environmental training program in managing, storing, and transporting hazardous wastes. That training program shall comply with the training requirements of 20.4.1.500 NMAC, incorporating 40 CFR §264.16(a)(3). All HAFB employees involved in waste management and storage at the CSU or who manage and store hazardous wastes shall be required to participate in the program. HAFB personnel shall be enrolled in the DRMS hazardous waste training program by their regional DRMS office.

Job Titles and Duties for Which Training is Required

The duties, responsibilities, and qualifications related to the positions responsible for managing and storing hazardous wastes at the CSU are as follows:

Position/Title: Defense Re-utilization and Marketing Office (**DRMO**) Chief.

Responsibilities: This individual shall direct the operations of the surplus property program at the HAFB, administer the disposal program at the HAFB, provide assistance and guidance to commands served, and shall be the technical authority on all disposal matters. The DRMO Chief shall ensure that personnel receive adequate training.

Major Duties: The major duties of the DRMO Chief also include:

- Interpreting regulations and developing necessary operating procedures.
- Processing an extremely wide variety of materials ranging from commonly used items to highly specialized items, including hazardous waste;

- Determining requirements for manpower, space, or equipment, and initiating necessary requisitions;
- Determining the need for modifications to existing facilities and initiating action to improve economy, efficiency, safety, and physical security of operations;
- Developing operating requirements and initiating requests for work;
- Maintaining personal contacts with Local and State government agencies, military commands, and the General Services Administration; and
- Delegating workload of subordinate employees based on difficulty and the degree of training. The HAFB Chief shall be invested with decision-making authority for resolution of work-related problems.

Position/Title: Environmental Protection Specialist

Responsibilities: The Environmental Protection Specialist shall serve as the HAFB hazardous waste management and storage focal point and shall advise the DRMO Chief on hazardous waste matters. He/she shall be responsible for ensuring compliance with requirements related to receiving, managing, storing, packaging, and disposing of hazardous waste. This specialist shall provide technical guidance to HAFB personnel in all aspects of hazardous waste processing.

Major Duties: The primary duties of the Environmental Protection Specialist shall include:

- Conducting periodic inspections to ensure that hazardous waste storage areas are maintained in accordance with pertinent State and Federal government regulations, and that hazardous waste turned in by generating activities is properly identified and packaged;
- Acting as the Emergency Coordinator at the CSU; reacting to spillage by containing, cleaning up, and decontaminating the spill site;
- Analyzing data and preparing hazardous waste reports as required; and
- Assisting DRMS personnel in providing on-the-job training for HAFB personnel involved with hazardous waste management operations.

Position/Title: Material Sorters and Classifiers

Responsibilities: These personnel shall be responsible for proper receipt, management and storage of hazardous waste. In this capacity, they shall verify the nomenclature, description, quantities, and conditions of hazardous waste containers against those listed on the documentation; and classify items based on inspection log data. These individuals shall also operate forklifts and bailing machines, as required, to manage and store hazardous waste.

Major Duties: Primary duties of the Material Sorters and Classifiers shall include:

- Receiving and unloading all incoming excess materials, surplus property, and hazardous waste authorized for turn-in to the HAFB;
- Ensuring that a properly prepared turn-in document accompanies each property transaction;
- Routing property in a manner that permits required processing with a minimum of handling and transportation;
- Warehousing all property physically received in HAFB from time of receipt until final disposition;
- Evaluating type of hazardous waste handling equipment needed, fire and safety hazards involved, protection requirements, and ease of movement;
- Arranging storage facilities for property to ensure segregation of property by type, condition, and sales appeal;
- Checking source document files and other records to determine the basis for over, short, or misplaced items;
- Assisting other personnel in conducting sales of surplus property including lotting, displaying; and
- Segregating property for sale.

Training Content and Frequency

The training program employed by DRMS for employees managing and storing hazardous wastes shall combine supervised on-the-job instruction and formal classroom training. Each employee shall learn about the particular dangers associated with hazardous wastes typically stored at HAFB and proper management and storage requirements. The on-the-job training shall provide HAFB employees working at the CSU with experience in the following areas:

- Physical layout of the CSU buildings, particularly the location and use of emergency equipment and systems (i.e., how to operate alarm systems);
- Basic hazardous waste disposal policies of HAFB (turn-in requirements, analysis, packaging, and record keeping);
- Basic procedures in handling, storing, and manifesting of hazardous waste;
- Inspection techniques and corrective action techniques for potential inadequacies;
- Emergency response procedures for spills, fires, explosions, shutdown of operations, evacuation procedures; and
- Procedures for how to use and inspect facility emergency and monitoring equipment.

The topics covered in the training course shall provide the employee with an understanding of potential hazards inherent in the job, as well as with the precautions necessary to minimize these hazards. In addition, HAFB personnel who manage and store hazardous wastes will meet annually to discuss the effectiveness of their training programs and recommend program needs. The initial training shall be reviewed annually to update personnel on regulatory changes, review requirements, and review operating procedures. The Spill Response Plan described in Permit Attachment H, *Appendix H-1*, shall be executed at least once annually for training purposes.

Personnel Training

Training shall be required for all HAFB personnel involved with hazardous waste management and storage at the CSU as outlined in the previous sections. The courses discussed shall provide instruction in the safe management and storage of hazardous wastes. Training shall also be provided in emergency response actions, in the use of protective gear, and personal safety. The course shall focus on regulatory compliance. In addition to these minimum training requirements, all on-site/on-Base transporters of hazardous waste shall be provided with specific training for transporting hazardous wastes. The training course shall include fundamental hazardous waste management concepts and shall provide information on how to implement the contingency plan outlined in Permit

Attachment H. The DRMS environmental/safety training program shall fulfill regulatory requirements for the environmental/safety training program. The DRMS training course, at a minimum, shall consist of:

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| < Hazardous waste identification | < Hazardous waste profiles |
| < Accumulation time frames | < Operating records |
| < Container management | < Recordkeeping/documentation |
| < Emergency Plan | < Waste analysis |
| < Inspections | < Land disposal restrictions |
| < Applicable OSHA requirements | < Applicable DOT requirements |

The Facility Environmental Flight shall also provide annual training for its hazardous waste satellite and 90-day accumulation point managers. The same program shall be used for all hazardous waste managers, including those at the CSU. The training shall be offered monthly. Training program course materials shall be maintained on file and shall be available upon request.

Implementation of Training Program

All current HAFB employee and future employees assigned to manage and store hazardous wastes shall complete the initial and annual refresher-training program within six months from their date of employment.

No employee shall work with hazardous wastes unsupervised until he/she has successfully completed on-the-job training. Formal training programs shall be attended by personnel as required by their duties.

Retention of Records

All records documenting the job title for each position, job description, employee's names, and completed training programs (both introductory and review) shall be kept on-site in the HAFB Administration Office located adjacent to the CSU. These records shall be kept until closure of the CSU for current employees and for three years from the date of termination for former employees.