

PERMIT ATTACHMENT 5: PERSONNEL TRAINING PROGRAM

5.0 INTRODUCTION

In accordance with 40 C.F.R. § 264.16, this Permit Attachment describes the personnel-training program that shall be adhered to for conducting safe operations, inspection, monitoring, and maintenance of the Chemical Waste Landfill (CWL) final cover system, access controls, and monitoring systems. The objective of this training program is to prepare CWL personnel to perform job duties in a safe, environmentally sound, and technically competent manner. To achieve this objective, the program provides all employees with training relevant to their positions. CWL personnel receive classroom and on-the-job training designed specifically to teach them how to perform their duties safely and in conformance with this Permit. CWL personnel shall receive all required training before being allowed to work in unsupervised positions.

The same personnel may be performing post-closure care work at both the CWL and adjacent Corrective Action Management Unit (CAMU); therefore, the training programs detailed in this Permit Attachment may be tailored to address both CWL and CAMU activities. Training records shall be maintained at the CAMU administration trailer for both CWL and CAMU personnel, along with the CWL Contingency Plan, emergency response procedures, and emergency response equipment.

5.1. RELEVANCE OF TRAINING TO JOB POSITION

This training program shall provide employees with training relevant to their positions and training necessary to safely perform their actual job tasks. Personnel shall be trained in operations specific to their job duties, and, where applicable, CAMU and CWL training will be integrated.

5.2. IMPLEMENTATION OF TRAINING PROGRAM

The training program shall be implemented to ensure that all CWL personnel receive the appropriate training in a timely manner. Personnel shall not work in unsupervised positions unless and until they successfully complete the indicated training requirements. Personnel must complete the training program described herein within six months of their assignment to the CWL.

5.3. OUTLINE OF THE TRAINING PROGRAM

5.4. JOB TITLE/JOB DESCRIPTION

Job titles, descriptions, and qualifications are provided in Tables 5-1, 5-2, and 5-3. The job descriptions include job duties and required education, skills, and experience.

TABLE 5-1
Job Title, Description, and Qualifications
CWL Project Leader/Operations Coordinator

Job Title: Chemical Waste Landfill (CWL) Project Leader/Operations Coordinator

Job Description: To provide ongoing oversight, supervision, and coordination at the CWL during the compliance and post-closure care periods for monitoring, inspection, and maintenance of the final cover system; groundwater and soil-gas monitoring; and access control, inspection, and maintenance in compliance with this Permit. Duties include, but are not limited to:

Coordinate and implement final cover system and access controls, monitoring, inspection and maintenance activities.

Coordinate and implement groundwater and soil-gas monitoring activities with the Facility's Sample Management Office (SMO) and off-site analytical laboratory.

Compile and archive groundwater and soil-gas monitoring data into the Facility's Environmental Restoration Data Management System and ES&H and Security Record Center.

Produce monitoring, inspection, and maintenance reports.

Maintain and revise sampling and analysis plans and associated operating/field procedures for post-closure care groundwater and soil-gas monitoring, as necessary.

Coordinate and oversee waste management activities associated with groundwater and soil-gas monitoring activities.

Assure the maintenance of records, such as training records, inspection and maintenance records, and data reports, as specified in this Permit.

Supervise the inventory, maintenance, and repair of all tools, supplies, equipment, and vehicles (i.e., ensure that they are in good working order) used for monitoring and maintenance operations.

Provide oversight of CWL Field Technicians.

Required Education, Skill, and/or Experience:

Bachelor's degree in chemistry, biology, physical science, engineering, environmental science, or

Minimum of 5 years experience in waste management operations and/or environmental restoration, and

Project management experience.

TABLE 5-2
Job Title, Description, and Qualifications
CWL Field Technician

Job Title: Chemical Waste Landfill (CWL) Field Technician

Job Description: To perform compliance and post-closure monitoring, inspection, and maintenance activities as instructed by the CWL Project Leader/Operations Coordinator.

Perform groundwater and soil-gas monitoring activities.

Perform inspection, maintenance, and repair activities.

Implement waste management associated with groundwater and soil-gas monitoring activities.

Assist CWL Project Leader/Operations Coordinator with waste management documentation and reporting activities.

Required Education, Skill, and/or Experience:

High school diploma or equivalent (e.g., General Education Development [GED])

A minimum of 1 year of prior field work experience in environmental restoration, monitoring, and/or waste management activities.

TABLE 5-3
Job Title, Description, and Qualifications
CWL Staff Biologist

Job Title: Chemical Waste Landfill (CWL) Staff Biologist

Job Description: To perform post-closure final cover system vegetation monitoring and inspection activities as instructed by the CWL Project Leader/Operations Coordinator.

Perform cover biology inspections.

Assist CWL Project Leader/Operations Coordinator with goal of establishing a self-sustaining community of native plants, addressing undesirable animal and plant disturbances/intrusions, documenting successful revegetation, and associated reporting.

Required Education, Skill, and/or Experience:

Bachelor's degree in biology, physical science, or environmental science, or

A minimum of 2 years of experience in botany and/or vegetation processes.

5.5. TRAINING CONTENT, FREQUENCY, AND TECHNIQUES

The Permittees' Department Manager responsible for CWL operations, or designee, will function as the Training Director. The Manager maintains responsibility for ensuring that all CWL-specific required training is obtained. The Manager/Training Director shall be knowledgeable about the applicable hazardous waste management regulations and specific RCRA-regulated waste management operations employed at the CWL. The Manager/Training Director determines the content and duration of training required for individual employees to ensure compliance with the training requirements of this Permit. The training program shall be administered by the Training Director, who is responsible for identifying and coordinating training required by the Post-Closure Care Permit, hazardous waste regulations, and Facility requirements. In accordance with 40 C.F.R. § 264.16(a)(2), the Training Director shall be a person trained in hazardous waste management procedures. The Training Director must review fully the CWL Operating Procedures and Refresher Training outlined in Table 5-4 before discharging his/her duties.

Training is required at the frequencies shown in Table 5-4. The Occupational Safety and Health Administration (OSHA) Hazardous Waste Worker Training and a minimum of 24 hours of initial OSHA Hazardous Waste Worker Training are required of all personnel that will work on-site at the CWL. All on-site personnel shall participate in a minimum of eight hours of annual refresher training. The CWL Operating Procedures and Refresher Training are function-specific so that an employee is provided training that is appropriate for his job function. A minimum of two hours of initial CWL Operating Procedures and Refresher Training and a minimum of two hours annual refresher training are required of all on-site CWL personnel.

5.6. EMERGENCY TRAINING

All personnel assigned to work at both the CWL and the adjacent CAMU are required to participate in unit-specific emergency training to ensure that they are able to respond effectively in an emergency situation. The training consists primarily of classroom training and on-site exercises. Topics covered shall include, at a minimum:

1. Emergency or incident notification procedures
2. Response to incidents or emergencies, including fires and releases of hazardous wastes
3. Procedures for using, inspecting, maintaining, and replacing emergency/ monitoring/spill cleanup equipment
4. Procedures for shutdown operations (if any)
5. Procedures for evacuation
6. Post-emergency/incident reports and actions
7. CWL Contingency Plan

**TABLE 5-4
Training Content**

**Occupational Safety and Health Administration
Hazardous Waste Worker Training and Refresher**

Duration: 24-40 hours initial, 8-hour annual refresher
Frequency: Initial and annual
Method: Classroom
Required CWL Attendees: Project Leader/Operations Coordinator, Field Technician, and Staff Biologist

Minimum Content:

Proper use of personal protective equipment
Overview of federal regulations related to hazardous materials and hazardous waste management
Guidelines for safe practices while managing hazardous waste
Overview of hazardous materials (i.e., properties, compatibility, toxicology)

CWL

Operating Procedures and Refresher

Duration: 2-24 hours initial, 2-8 hours annual refresher
Frequency: Initial and annual
Method: Procedure review, on-the-job training
Required CWL Attendees: Project Leader/Operations Coordinator; Field Technician; Staff Biologist; Training Director

Minimum Content: This training is function-specific, divided into sections or modules. Each employee must participate in the sections that apply to his specific job function. Example sections include, but are not limited to, the following:

- Post-Closure Care Permit and associated training requirements
- Post-closure inspection requirements, frequency, and documentation (i.e., forms)
- Written standard operating procedures
- Post-Closure Care and Compliance Groundwater and Soil-Gas Sampling and Analysis Plans
- Referenced operating procedures and SMO guidance/procedures
- Groundwater Monitoring Waste Management Plan (FOP 05-04)
- Groundwater Health and Safety Plan (PLA 05-09)
- Security, site entry, and site control at the CWL and adjacent CAMU
- Operation, maintenance, and inspection of CWL monitoring equipment
- Record keeping and maintenance
- Review of the CWL Contingency Plan and emergency response procedures
- RCRA facility or operating permit Module IV requirements
- Review of emergency procedures, emergency equipment, and emergency systems

5.7. TRAINING RECORDS

In accordance with 40 C.F.R. § 264.16(d) training records shall be kept to document the type, amount, and dates of training received for each assigned employee. Contents of these records shall include the following, at a minimum:

- The name of the employee
- Job title and a written job description
- Training requirements for each job position
- Records that document training received, such as amount, dates, and certificates; attendance or signature lists; memoranda of training; or reports from computerized training databases

Training records for current employees shall be kept until the end of the post-closure care period. Training records for any former employee shall be kept for a minimum of three years from the last date the employee worked at the CWL. A current approved training program and training records for personnel for the previous 12 months shall be maintained at the CAMU administration trailer for both CWL and CAMU personnel. All other training records and documentation shall be maintained by the CWL Project Leader/Operations Coordinator or designee at the Environmental Safety and Health (ES&H) and Security Records Center.