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WESF DANGEROUS WASTE TRAINING PLAN

FM SIMMONS

B&W HANFORD COMPANY

Richland, WA 99352

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Abstract:

This training plan describes general requirements, worker categories, and provides course descriptions for operation of the WESF permitted miscellaneous storage units, and the <90 day accumulation areas.

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WASTE ENCAPSULATION STORAGE FACILITY

WESF

DANGEROUS WASTE TRAINING PLAN

Per

WAC 173-303-330

April 1999

WESF DANGEROUS WASTE TRAINING PLAN

APPROVALS



F. M. Simmons, Environmental Compliance Officer

4/5/99

Date



M. M. Pereira, Project Support Manager

4/20/99

Date



J. L. Pennock, WESF Facility Manager

4-20-99

Date

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1.0 INTRODUCTION

Washington Administrative Code (WAC), Chapter 173-303-330 of the *Dangerous Waste Regulations* requires a written training plan for the operation of dangerous waste management units. WAC 173-303-200, "Accumulating Dangerous Waste On-Site," requires compliance with WAC 173-303-330, "Personnel Training." This WESF Dangerous Waste Training Plan (DWTP), in conjunction with Chapter 8.0 of the Hanford Facility Dangerous Waste Permit Application, General Information Portion (DOE/RL-91-28), complies with the requirements of WAC 173-303. This plan is written to comply with the PHMC implementing procedure, HNF-PRO-459, *Environmental Training*.

WESF regulated units are managed as generator units under WAC 173-303-200. WESF manages permitted miscellaneous storage waste units under WAC 173-303-680.

2.0 SCOPE

This DWTP applies to personnel who perform work at, or in support of WESF. The plan, including the names of personnel, may be given to a regulatory agency inspector upon request. All general workers, subcontractors, or visiting personnel who have not been trained in the management of dangerous wastes must be accompanied by an individual who meets the requirements of this training plan. Dangerous waste management units covered by this plan include:

- Less-than-90-Day Accumulation Area(s)
- Pool Cells 1-8 and 12 Storage Units
- Process Cells A-G Storage Units

This training plan describes general requirements, worker categories, and provides course descriptions for operation of the WESF permitted miscellaneous storage units and the Less-than-90-Day Accumulation Areas.

3.0 RESPONSIBILITIES

A dangerous waste generator must provide personnel training as directed by WAC-173-303-330. Fluor Daniel Hanford (FDH) Site Training is responsible for developing the general Hanford Site program of classroom instruction. Facility managers are responsible for developing a program for unit/building-specific training that supplements the Hanford Site training program. Ultimate responsibility for a compliant dangerous waste training program at WESF rests with the FASTER/WESF Director.

3.1 Facility Manager

The WESF Facility Manager has the functional responsibility for meeting the training requirements of WAC 173-303-330 and Condition II.C of the Hanford Facility RCRA Permit.

3.2 Line Managers

All managers are responsible for:

- a. Determining required training for personnel assigned to WESF based on job assignment and responsibilities.
- b. Ensuring that personnel assigned to WESF receive required initial training, continuing training, and refresher training as needed to be qualified to perform assigned duties in dangerous waste management.

3.3 Training Personnel

Training personnel are responsible for:

- a. Reviewing training requirements whenever regulations change, or annually at a minimum, for adherence to regulations, and to ensure the requirements reflect the current systems, procedures, and policies applicable to each position; and
- b. Developing and conducting training on new and existing systems or equipment.

4.0 TRAINING PROGRAM

4.1 General Training Requirements

General requirements of the WESF dangerous waste training program include the following.

- a. Personnel must be instructed to perform duties in compliance with WAC 173-303.
- b. Instruction must be conducted by a person knowledgeable of dangerous waste management procedures, and the training must be relevant to the employee's position.
- c. A facility-specific program is required and must include instruction to familiarize personnel with applicable procedures (inspection plans, operating procedures, etc.), container management practices, spill response, and emergency procedures. An annual review of the Building Emergency Plans and supporting procedures/guides maintained at the unit/building will satisfy the spill response and emergency procedure review.
- d. New employees must receive training within six months of employment or transfer, and must be supervised until training is completed.
- e. Employees must receive appropriate annual refresher training.
- f. Employees have six months to complete any revised or new training imposed by this plan.

4.2 Training Plan Content Requirements

WAC 173-303-330(2) requires the training plan to contain the following.

- a. The job title, job description, and the name of the employee filling each job/position related to dangerous waste management at the facility. The job description must include the requisite skills, education, other qualifications, and duties for each position.
- b. A written description of the type and amount of both introductory and continuing training required for each position.

- c. Records documenting that facility personnel have received and completed the training required by this section.

Sections 4.3 through 4.6 describe how these requirements are met at WESF.

4.3 Worker Categories

Personnel are placed into six worker categories to properly assign training that is commensurate with their duties and responsibilities. Personnel duties and responsibilities may overlap between categories. When overlaps occur, personnel will complete applicable courses from each category that applies. The determining factor for placing personnel in a specific worker category is the corresponding job duties. The six worker categories are as follows:

- a. All Employees
- b. General Workers
- c. Advanced General Workers
- d. General Managers
- e. General Shippers
- f. Waste Designators.

Table 1 provides the duties that correspond with these categories. The descriptions of job duties for each category are general in nature. However, the descriptions do provide adequate specifics that can be matched to individual job titles or job positions commonly found at the Hanford Site. The responsibilities for personnel categorized as General Workers, Advanced General Workers, General Managers, General Shippers and Waste Designators are provided because these categories are directly associated with the safe and compliant management of dangerous and/or mixed waste at WESF.

WESF Training Services maintains a current list of the names of personnel who perform work under the categories of Advanced General Worker, General Manager, General Shipper, and Waste Designators. According to HNF-PRO-459, *Environmental Training*, Section 2.2.2, "Training Plan," names of Hanford Facility personnel, and non-Hanford Facility personnel who perform duties and responsibilities within the All Employee or General Worker categories need not be identified in a training plan.

Table 1. Worker Categories

Worker Categories	Generator and TSD Job Duties	WESF Job Titles/Classifications ¹
ALL EMPLOYEES: (WESF Facility or Non-Facility Personnel)	Not categorized as a General Worker, Advanced General Worker, General Manager, General Shipper, or Waste Designator. Will not manage waste in accumulation containers. Responsible to report spills and releases they discover. Must respond to specific incidents that may occur.	<ul style="list-style-type: none"> • Administrative Personnel • Oversight Personnel • Manager (except those included in other categories) • Engineer • Maintenance Personnel (includes subcontracted) • Radiological Control Technician (RCT) • Stationary Operating Engineer (SOE) • Visitor • Other Non-Hanford Contractors
GENERAL WORKER: (WESF Facility or Non-Facility Personnel)	Personnel with limited dangerous waste management duties, such as activities associated with generating and placing in appropriate containers dangerous waste from facility maintenance or modification. Work under the direction of an Advanced General Worker, General Manager, or General Shipper.	<ul style="list-style-type: none"> • Transporter² • Nuclear Chemical Operator⁴
ADVANCED GENERAL WORKER: (WESF Facility Personnel only) ⁵	Manage dangerous waste in containers and storage containment buildings. Select, inventory, package, and prepare containers of dangerous waste for movement including proper marking and labeling of containers. Perform inspections of waste storage locations. Collect samples of dangerous waste and prepare samples for delivery to a laboratory. TSD unit-specific duties include operation and surveillance of container storage units and < 90 day accumulation units, as well as off-normal operational responses to maintain units within operational parameters. Contingency plan duties include responding to small spills in accordance with approved procedures/plans.	<ul style="list-style-type: none"> • Hazardous Material Specialist³ • RCT 1st Line Supervisor² • Nuclear Chemical Operator⁴
General Manager (WESF Facility Personnel only) ⁵	Environmental Compliance Officer, someone qualified as the Building Emergency Director (BED), or someone who directs General Workers and Advanced General Workers in dangerous waste management activities. Responsible for the accountability and directing employees during dangerous waste emergency events.	<ul style="list-style-type: none"> • On-Call Building Emergency Director • Configuration Control Authority • Manager or Supervisor of General Worker, Advanced General Worker, General Shipper, or Waste Designator • Environ Compliance Officer
General Shipper (WESF Facility Personnel only) ⁵	Preparation and shipment of dangerous waste containers in compliance with applicable requirements, including signing of necessary shipping documentation. Directs General and Advanced General Workers in dangerous waste management and/or transportation activities.	<ul style="list-style-type: none"> • Hazardous Material Specialist³
Waste Designator (WESF Facility Personnel only) ⁵	Performs or completes waste designations at the facility	<ul style="list-style-type: none"> • Hazardous Material Specialist³

¹ Duties and responsibilities of WESF personnel must be compared to the table.² Contracted individual.³ Performs Advanced General Worker, General Shipper, and Waste Designator duties. WMH personnel matrixed to WESF.⁴ Depending on job assignment.⁵ Designated to survey waste storage units and <90 day accumulation units.

In general, all personnel require a high school diploma or General Equivalent Diploma. Personnel filling exempt management or engineering positions may require a college degree with two or more years of industry experience.

Many prerequisites exist for these positions. In some cases, a college degree may be waived as a prerequisite requirement. An equivalent combination of education and experience also may be accepted. Additional information regarding specific prerequisites can be provided on request. The following sections describe, within the appropriate worker category, the job titles and a brief position description of personnel at the facility who are categorized as All Employees, General Workers, Advanced General Workers, General Managers, General Shippers, and Waste Designators.

4.4 Job Descriptions and Qualifications

All personnel are assigned a job title (from the salaried nonexempt or bargaining unit classifications) or a position (from the exempt classifications). Each job or position description includes requisite skills, work experience, education, other qualifications, and a list of duties and/or responsibilities. The FDH Human Resources Department maintains information regarding work experience, education and other qualifications required for each position.

Personnel who are assigned duties in one of the five worker categories (General Worker, Advanced General Worker, General Manager, General Shipper, Waste Designator) and become delinquent in their training, must be supervised by a trained person until the retraining is successfully completed. New employees and transfer personnel must receive training within six months of employment or transfer, and must be supervised by a trained person until completion of training. Upon re-qualification, the person may be allowed to resume previously assigned duties.

Names and titles of personnel assigned General Worker, Advanced General Worker, General Manager, General Shipper, and Waste Designator responsibilities and duties are located in Attachment C. Training (course) requirements are maintained in the PHMC training matrix (TMX) system for the individuals currently performing work in each of these categories. The TMX will serve as documentation of personnel changes to Attachment C that occur after approval of this plan and before the next plan update.

4.4.1 All Employees

WESF personnel designated as "All Employees" are not categorized into one of the other five worker positions. Non-WESF personnel included in this category are those individuals not categorized as General Workers (discussed next), and who require access to portions of WESF not accessible to the public. Personnel in the All Employees category are prohibited from performing duties or responsibilities associated with the management of waste in accumulation/storage containers at WESF. All personnel have the responsibility to report spills and releases that they discover and to evacuate or take cover as directed during specific incidents.

WESF administrative personnel categorized as All Employees primarily include secretaries, clerks, engineers, and managers. Most non-WESF personnel are categorized as All Employees because these personnel generally tour, provide oversight, or are brought to WESF for interviews. Other

non-WESF personnel who require access to WESF controlled areas to complete work that does not involve the management of dangerous waste are also categorized as All Employees.

4.4.2 General Workers

WESF or non-WESF personnel with waste management duties and responsibilities limited to the initial generation of dangerous waste and placing that waste into pre-approved containers are categorized as General Workers. Pre-approved containers may be in a satellite accumulation area, 90-day accumulation area, or TSD storage unit. These personnel could generate dangerous waste while working on a non-RCRA system (e.g., building maintenance) or on a TSD unit while performing maintenance or modifications on facility systems. The work may be unsupervised or completed under the supervision of qualified unit/building personnel (e.g., person-in-charge (PIC)).

WESF personnel categorized as General Workers may be assigned duties and responsibilities for the following:

1. Placing waste they generate into pre-approved containers and filling out logsheets where applicable.
2. Completing radiological surveys of dangerous waste.
3. Loading packaged containers onto trucks or moving containers.
4. Responding to a spill or release of known contents where the duties and responsibilities are limited to containing the spill/release, returning the drum to an upright position, and placing the known spilled material or waste into a pre-approved container.
5. Applying advanced container markings or labels based on direction from an Advanced General Worker, General Manager, or General Shipper.
6. Responding to regulatory and agency compliance inspector questions about waste management practices.

4.4.3 Advanced General Workers

WESF personnel are categorized as Advanced General Workers if their duties and responsibilities concerning dangerous waste exceed that of General Workers. Examples of duties and responsibilities for container management include: inspecting containers, determining advanced container markings and preparing container logsheets, completing waste inventories, sampling waste, and responding to spills and releases of unknown materials or wastes according to approved procedures.

4.4.4 General Managers

Included in this category are various WESF managers, and WESF personnel who direct General Worker or Advanced General Worker activities. Managers and those who direct General Workers and Advanced General Workers have many similar duties and responsibilities relating to dangerous waste management and are required to take the same courses.

The following WESF positions are included in this category:

- Facility Manager
- On-Call Building Emergency Director (Emergency Coordinator)
- Configuration Control Authority
- Environmental Compliance Officer
- Radiological Control Manager
- Facilities Support Team Coordinator
- Surveillance Team Coordinator

4.4.4.1 On-Call Building Emergency Director (OBED)

Job duties and responsibilities of the WESF OBED with regard to dangerous waste management include the following:

- 1) Function as the BED/Coordinator, as defined in WAC 173-303-360;
- 2) Determine if a dangerous waste contingency plan* should be implemented during the course of an incident or process upset;
- 3) Ensure all reports to the Washington State Department of Ecology are made after an incident or process upset has occurred; and
- 4) Become thoroughly familiar with the WESF contingency plan, operations and activities associated with dangerous waste, location and properties of all facility dangerous wastes, facility layout, and locations of dangerous waste records.

* Contingency plan is contained in *Emergency Plan for Waste Encapsulation Storage Facility*, HNF-IP-0263-WESF.

4.4.4.2 Environmental Compliance Officer

The WESF Environmental Compliance Officer is assigned the following dangerous waste management duties and responsibilities:

- 1) Provide support to WESF management to ensure compliance with the applicable environmental regulations and permits.
- 2) Understand and be able to explain the status of WESF environmental compliance.
- 3) Ensure that WESF management is aware of the facility's environmental compliance status and activities.

4.4.4.3 Manager/Supervisor of Advanced General Workers

Job duties and responsibilities related to dangerous waste management for Managers/Supervisors of Advanced General Workers at WESF include the following:

- 1) Maintain control over WESF work in accordance with established operating and maintenance procedures, and applicable environmental regulations.
- 2) Ensure compliance with WESF operating limits and specifications related to waste management units.
- 3) Ensure that appropriate dangerous waste management documentation is maintained.

- 4) Respond to and provide remedial guidance and decisions for operational anomalies, off-normal conditions, and equipment malfunctions according to established procedures.
- 5) Notify the On-Call Building Emergency Director (OBED) of any unplanned releases to the environment.
- 6) Coordinate the measurement of, recovery from, and re-establishment of control of unplanned releases to the environment and other emergency conditions.

4.4.5 General Shippers

Personnel who prepare and ship dangerous or mixed-waste containers in compliance with applicable requirements, including signing necessary shipping documentation are categorized as General Shippers in the RCRA training program. General Shippers may also direct operational activities of General Workers and Advanced General Workers relating to dangerous waste management or transportation activities. There is no distinction within this position based on where a dangerous waste movement will initiate, terminate, or which road along which the movement will travel. General Shippers are Waste Management Hanford (WMH) personnel matrixed to WESF.

4.4.6 Waste Designators

Waste Designators at WESF are WMH Hazardous Material Specialists matrixed to WESF. Waste Designator duties and responsibilities at WESF include the following:

1. Verify that dangerous waste generated at the facility is properly designated in accordance with WAC 173-303.
2. Perform/complete waste designations necessary to facilitate treatment, storage or disposal of dangerous waste at WESF.
3. Ensure that correct land disposal restriction (LDR) determinations and notifications are included with waste designations.

4.5 Training Course Requirements

Personnel are placed into one of the six worker categories to properly assign the correct training that is commensurate with their duties and responsibilities. Attachment B lists the six waste worker categories and corresponding required courses, which is used to determine the required courses for each worker. Attachment A contains additional information about the courses.

4.6 Emergency Response Training

Federal and state regulations require that personnel be able to respond effectively to emergencies. In accordance with WAC 173-303-330(1)(d), personnel are trained on emergency equipment, systems, and procedures. WESF operations involve the management of dangerous waste in containers and in miscellaneous storage units. Table 2 indicates requirements from WAC 173-303-330(1)(d) that are applicable to each TSD unit operation. Training topics required by federal and state dangerous waste regulations are included in Hanford Site and facility-specific courses. The courses cover a wide spectrum of target audiences, ranging from courses that provide the level of information appropriate for All Employees to courses that provide training on responsibilities of General Managers who function as the emergency coordinator, as defined in WAC 173-303-360.

Table 2. Applicability of WAC 173-303-330(1)(d).

WAC 173-303-330(1)(d) Criteria Emergency Response	WESF 90-Day Accumulation Area	WESF Miscellaneous Storage Units
Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment	Yes	Yes
Communications or alarm systems	Yes	Yes
Response to fires or explosions	Yes	Yes

4.7 Training Records

4.7.1 Location of Training Records

Training records, as described in WAC 173-303-330, consist of documentation that show training has been completed. Hanford Site Management Information Systems (MIS) facility training records include both electronic data storage and hard copies. The electronic data storage information consists of the training record initially presented to demonstrate that personnel have been trained. After a course is completed, the electronic data storage record is created on the PeopleSoft system. A non-record copy of each employee's completed training is maintained by WESF Training Services.

The electronic data storage record contains the course number, course title, date of attendance, and any refresher dates. Hard copies of training records that are sent to MIS for entry in the PeopleSoft system are initially maintained in Richland, Washington. Original hard-copy training records are transferred quarterly to the Records Holding Facility in Richland, Washington. After approximately one year, the original hard-copy training records are archived at the permanent record storage center in Renton, Washington. Electronic training records of former employees are kept for at least three years from the date the employee last worked at WESF.

4.7.2 Access to Training Records

When a training record is requested during an inspection, an electronic data storage record will initially be provided. When the electronic data storage record does not satisfy the inspection concern, a hard copy training record will be provided. Training records of former employees may not be available on computers at WESF and may require a representative from MIS to access the PeopleSoft system for this information.

4.7.3 Determining Current Training Status

After an electronic data storage training record is obtained, it will be compared to information in this plan. The electronic data storage-training record coupled with the information contained in this training plan will give any inspector the ability to quickly determine the training status of personnel in the field.

4.8 Updating the Dangerous Waste Training Plan

The WESF Dangerous Waste Training Plan will be reviewed annually and updated as necessary by WESF emergency preparedness and training personnel.

4.9 Resource Conservation and Recovery Act Course Descriptions

Table 3 provides descriptions of courses driven by the Dangerous Waste Regulations (WAC 173-303). Attachment B identifies relationships between waste worker categories and required courses.

Table 3. Courses Driven by WAC 173-303 Requirements.

Course No.	Course Title
HANFORD SITE COURSES	
000001	Hanford General Employee Training (HGET)
000090	Visitor/Vendor Training (video or brochure)
02006G	Waste Management Awareness
02028B	Building Emergency Director Training
020159	Hazardous Waste Shipper Certification - Advanced Course 2
035010	Waste Designation
035012	Waste Designation Qualification
035020	Facility Waste Sampling and Analysis
035100/035110	Container Waste Management/Refresher
035120/035130	Waste Management Administration/Refresher
UNIT/BUILDING SPECIFIC COURSES	
400810/400815	WESF Facility Orientation/Refresher
03E025	WESF Facility Emergency and Hazards Information Checklist
402210	WESF Emergency Procedures/Abnormal Plant Conditions (General-Radiation Worker)
402215	WESF Emergency Procedures/Abnormal Plant Conditions (General-Non Radiation Worker)
400600	WESF Facility Emergency Procedures/Abnormal Plant Conditions (Process)
400620	WESF Facility Emergency Procedures/Abnormal Plant Conditions (Technical)
400470	WESF Manipulator Operator Qualification
400480	WESF Storage Pool Operations
400500	WESF Surveillance Operations

5.0 REFERENCES

DOE/RL-91-28, *Hanford Facility Dangerous Waste Permit Application*, General Information, Chapter 8.0, U.S. Department of Energy, Richland Operations Office, Richland, Washington.

FSP-WESF-001, Section TN-1, "WESF Training Program," B&W Hanford Company, Richland, Washington.

Hanford Facility RCRA Permit, Washington State Department of Ecology, Olympia, Washington.

HNF-PRO-459, *Environmental Training*, Rev. 0, Fluor Daniel Hanford, Inc., Richland, Washington.

WAC 173-303, *Washington Administrative Code (WAC) Dangerous Waste Regulations*, Washington State Department of Ecology, Olympia, Washington.

6.0 ATTACHMENTS

Attachment A provides course descriptions for training that applies to some or all worker categories. Attachment B provides the relationship between waste worker categories and required courses. Attachment C lists the names and titles of WESF personnel in each worker category.

ATTACHMENT A
DANGEROUS WASTE TRAINING COURSE DESCRIPTIONS

HANFORD SITE COURSES:

Title	000001 Hanford General Employee Training (HGET)
Description	Course presents DOE Orders and applicable policies pertaining to employer and employee rights and responsibilities, general radiation training, hazard communications, dangerous waste, fire prevention, personal protective equipment, safety requirements, certain unit/building orientation refresher training, emergency preparedness, accident reporting, and avenues for addressing safety concerns.
Mandating Document(s)	Hanford Facility RCRA Permit, General Condition II.C.2 and 4, HNF-PRO-459
Target Audience	All Hanford Facility employees & some non-Hanford Facility personnel working on the Hanford Facility. Waste Worker Categories: All Employees, General Worker, Advanced General Worker, General Manager, General Shipper, and Waste Designator
Frequency	Annual

Title	000090 Visitor/Vendor Training (Video or Brochure)
Description	Course is designed to acquaint and familiarize visitors and subcontractors with safety, security, and emergency preparedness requirements and their responsibilities to notify Hanford Facility personnel when situations arise. In addition, this orientation identifies the need to obey signs and labels that may be encountered regarding radiological areas, hazardous materials, and dangerous wastes.
Mandating Document(s)	10 CFR 835.901, Hanford Facility RCRA Permit, General Condition II.C.4, HNF-PRO-459
Target Audience	Visitors/vendors/subcontractors working on the Hanford Site 7 days or less. Note: If host desires unescorted access for <7days, 03E025 and 400810 required.
Frequency	None, unless badge expires

Title	02006G Waste Management Awareness
Description	Course introduces workers to federal laws governing chemical safety in the work place. Provides the hazardous material/waste worker with the basic fundamentals for safe use of hazardous materials and initial accumulation of dangerous waste in containers. The concepts covered in the course instruct personnel on specific waste generation procedures and requirements which include: (1) Applicable waste management practices (i.e., waste stream identification, waste segregation practices, completing container logsheets, and housekeeping requirements); (2) proper responses to incidents pertaining to the waste in the initial accumulation containers; (3) proper responses to dealing with waste of unknown origins; and (4) proper responses to questions posed in the field concerning the above elements.
Mandating Document(s)	29 CFR 1910.1200 RL/USACE letter to Ecology responding to Consent Order No. DE 94NM-063 Hanford Facility RCRA Permit, General Conditions II.C.1 and 4 WAC 173-303-330(1), HNF-PRO-459
Target Audience	Waste Worker Categories: General Worker, Advanced General Worker, and General Manager. Subcontractors categorized as General Workers.
Frequency	One time only. Justification: Annual training is not required for 02006G because unit/building specifics are adequately covered through the 03E025 course.

Title	02028B Building Emergency Director Training
Description	Course provides an overview of the responsibilities of the Building Emergency Director, identifies the building emergency organizations, actions required during an event, implementing the contingency plan, and discusses drill and exercise requirements.
Mandating Document(s)	WAC 173-303-330(1), -350, and -360, HNF-PRO-459
Target Audience	Hanford Facility personnel categorized as General Managers because they perform the responsibilities of a RCRA Emergency Coordinator through the title of Building Emergency Director or alternate Waste Worker Category: Only those General Managers assigned as OBED
Frequency	Annual

Title	035010 Waste Designation
Description	Course teaches dangerous waste designation according to WAC 173-303. Class content includes section-by-section lecture on the regulations, with examples following each section. Students complete examples using a waste designation flow chart. Examples addressed include listed waste, characteristic waste, and Washington State criteria: toxicity and persistence.
Mandating Document(s)	WAC 173-303-330(1), -070, AND -080 THROUGH -100, Hanford Facility RCRA Permit, 29 CFR 1910.1200 RL/USACE letter to Ecology responding to Consent Order No. DE 94NM-063, 40 CFR Part 268, HNF-PRO-459
Target Audience	Waste Worker Categories: General Shipper and Waste Designator
Frequency	One-time only Justification: The Waste Designation Qualification course annually qualifies those personnel who designate waste. General Shippers do not need to be annually retrained in this course because they can rely upon other resources within the company to help them ensure wastes are properly designated.

Title	035012 Waste Designation Qualification
Description	Course is a qualification for those persons performing waste designation activities in accordance with WAC 173-303.
Mandating Document(s)	WAC 173-303-330 (1), -070, and -080 through -100, Hanford Facility RCRA Permit, 29 CFR 1910.1200 RL/USACE letter to Ecology responding to Consent Order No. DE 94NM-063, HNF-PRO-459
Target Audience	Waste Worker Category: Waste Designator
Frequency	Annual

Title	035020 Facility Waste Sampling and Analysis
Description	Course presents waste sampling methodologies according to EPA Protocols SW-846, Test Methods for Evaluating Solid Waste Physical/Chemical Methods. Also covers documentation requirements in a sampling plan, waste analysis plan, field and laboratory quality control/assurance, data quality objectives process, and use of actual sampling equipment as specified by WAC 173-303-110. Finally, topics on listed waste management pertaining to sample management and available on-site sampling services are covered
Mandating Document(s)	WAC 173-303-330(1), HNF-PRO-459 - Environmental Training, Hanford Facility RCRA Permit, 29 CFR 1910.1200 RL/USACE letter to Ecology responding to Consent Order No. DE 94NM-063, HNF-PRO-459
Target audience	Waste Worker Category: General Shipper
Frequency	One time only Justification: In most cases, the General Shipper will use resources from outside organizations to physically acquire samples. In addition, the General Shipper will also rely on the review and approval process for the development and issuance of Sampling and Analysis Plans regarding a sampling effort. This training provides an overview of information to ensure that sampling efforts are properly arranged for and planned.

Title	035100 Container Waste Management - Initial
Description	Course covers general training requirements pertaining to waste management in containers at Less-than-90-Day Accumulation Areas and TSD units. The course incorporates WAC 173-303-200(1) and -630, DOE Orders, and site policy for container management. Includes practical exercises for hands-on experience with the packaging of dangerous waste, and preparation of packages for final destination. This course <u>does not cover</u> waste management aspects pertaining to other dangerous waste management units such as tank systems, surface impoundment's, containment buildings, landfill, etc.
Mandating Document(s)	WAC 173-303-330(1), Waste Minimization, Hanford Facility RCRA Permit, and 29 CFR 1910.1200 RL/USACE letter to Ecology responding to Consent Order No. DE 94NM-063, HNF-PRO-459
Target Audience	Advanced General Workers and General Managers categorized because they are immediate managers/supervisors of Advanced General Workers who manage containers of dangerous waste. Waste Worker Categories: Advanced General Worker and General Manager
Frequency	Annual (Retrained annually by 035110 Container Waste Management Training - Refresher)

Title	035120 Waste Management Administrative - Initial
Description	Course is designed for personnel preparing to become shippers of dangerous and/or mixed waste. Course covers regulatory and company policies, forms, reports, forecasts, and plans. Topics also covered include waste characterization, waste storage disposal request, low-level waste storage/disposal record, transuranic waste storage/disposal record, and radioactive mixed waste attachment sheet. In addition, students will learn how these forms are used to complete shipping papers.
Mandating Document(s)	WAC 173-303-330(1), -630, -200, -210, -220, -380, and -390, Hanford Facility RCRA Permit, and 29 CFR 1910.1200 RL/USACE letter to Ecology responding to Consent Order No. DE 94NM-063, HNF-PRO-459
Target Audience	Waste Worker Category: General Shipper
Frequency	Initial (Retrained annually by 035130 Waste Management Administration - Refresher)

Title	020159 Hazardous Waste Shipper Certification - Advanced Course 2
Description	Course introduces General Shippers to identify shipper responsibilities and liabilities with regard to compliance to manifesting requirements and DOT regulations, including placarding, identifying proper shipping names, and loading requirements.
Mandating Document(s)	49 CFR Part 172 Subpart H, HNF-PRO-459
Target Audience	General Shippers of dangerous waste on roadways anywhere on Hanford Site. Hazmat employees, who are designated to be authorized shippers and validate that all aspects of a hazardous material, waste or radioactive material shipment is made in 100 percent compliance with 49 CFR. These individuals must personally sign the shipping documentation and accept responsibility for the materials being transported. Waste Worker Category: General Shipper
Frequency	36 Months. Not required if certified on course #020078.

Title	020078 Mixed Waste Shipper Certification Training - Advanced Course 4
Description	This course provides the successful participant with certifications for authority to sign for shipments of mixed waste in 100% compliance with 49 CFR. This course builds off of all the prerequisite training providing application of the regulations as they pertain to scenarios involving mixed-waste shipments.
Mandating Document(s)	49 CFR, Part 172, Subpart H
Target Audience	Hazmat employees, who are designated to be authorized shippers and validate that all aspects of a hazardous material, waste or radioactive material shipment is made in 100-percent compliance with 49 CFR. These individuals must personally sign the shipping documentation and accept responsibility for the materials being transported. Waste Worker Category: General Shipper
Frequency	36 Months. If current in this course, the employee is not required to be current in course 020159.

UNIT/BUILDING SPECIFIC RCRA COURSES:

Title	400810 WESF Facility Orientation
Description	This is required training for unescorted access to WESF. The course provides information on facility emergency signal and responses, radiation, contamination control, zone entry, hazardous materials, emergency equipment, protective tags, personal conduct, and security.
Mandating Document(s)	WAC 173-303-330, DOE Order 5480.20A, DOE Order 4330, HNF-PRO-459
Target Audience	Personnel who require unescorted access to WESF buildings. Waste Worker Categories: All Employees, General Worker, Advanced General Worker, General Manager, General Shipper, and Waste Designator
Frequency	Annual (retrained annually through 400815)

Title	03E025 Facility Emergency and Hazards Information Checklist
Description	The Facility Emergency and Hazard Information Checklist, which is required to be filled out after reviewing the BEP, provides the information that managers are required to discuss with their employees.
Mandating Document(s)	DOE/RL-94-02, WAC 173-303, -350 and 360, 29 CFR 1910.1200, HNF-PRO-459
Target Audience	Personnel who require unescorted access to WESF buildings. Waste Worker Categories: All Employees, General Worker, Advanced General Worker, General Manager, General Shipper, and Waste Designator
Frequency	Annual

Title	WESF EP/APC, 402210-General (Radiation Worker), 402215-General (Non-Radiation Worker), 400600-Process, 400620-Technical
Description	This course will prepare the student for emergency conditions that may occur during operation of WESF. Provides information on facility description and hazards, emergency signals and responses, the emergency response organization, emergency procedures and equipment, and emergency notification. WESF management determines the appropriate level of training for personnel depending on individual emergency response responsibilities.
Mandating Document(s)	DOE Order 5480.20A, DOE-0223, HNF-UIP-1264, WAC 173-303-330(1)(d), -340, -350, and -360, 29 CFR 1910.120, HNF-PRO-459
Target Audience	All WESF personnel and some non-WESF personnel who require routine access to WESF buildings. Waste Worker Categories: All Employee, General Worker, Advanced General Worker, and General Manager
Frequency	Annual

Title	400470 WESF Manipulator Operator Qualification
Description	Course provides WESF operators with manipulator operations and safety training necessary to perform their duties for qualification. Includes a self-study course, an OJT checklist covering the skills portion of manipulator operations, a comprehensive written examination, and a job performance measure (JPM) or performance demonstration.
Mandating Document(s)	DOE Order 5480.20A, HNF-PRO-459
Target Audience	WESF Nuclear Chemical Operators Waste Worker Category: Advanced General Worker
Frequency	Biennial

Title	400480 WESF Storage Pool Operations
Description	Course provides WESF operators with storage pool operations and safety training necessary to perform their duties for qualification. Includes a self-study course, an OJT checklist covering the skills portion of storage pool operations, a comprehensive written examination, and a job performance measure (JPM) or performance demonstration.
Mandating Document(s)	DOE Order 5480.20A, HNF-PRO-459
Target Audience	WESF Nuclear Chemical Operators Waste Worker Category: Advanced General Worker
Frequency	Biennial

Title	400500 WESF Surveillance Operations
Description	Course provides training for the certification of operators on WESF surveillance, including responding to off-normal conditions, adding demineralized water to the pool cells, maintaining laundry limits, performing fire watches, documenting paperwork during and/or at the end of shift, and completing surveillance data sheets. Includes a self-study course, an OJT checklist covering the skills portion of surveillance operations, a comprehensive written examination, and a job performance measure (JPM) or performance demonstration.
Mandating Document(s)	DOE Order 5480.20A, HNF-PRO-459
Target Audience	WESF Nuclear Chemical Operators Waste Worker Category: Advanced General Worker
Frequency	Biennial

ATTACHMENT B

WASTE WORKER CATEGORIES, COURSE NUMBERS, AND COURSE TITLES

Course Requirements by Waste Worker Category						
Course # / Course Title	All Employees	General Worker	Advanced General Worker	General Manager	General Shipper	Waste Designator
HANFORD SITE COURSES:						
000001 Hanford General Employee	X	X	X	X	X	X
000090 Visitor/Vendor Training (video or brochure)	X ¹					
02006G Waste Management Awareness		X	X	X		
02028B Building Emergency Director Training				X ²		
020159 Hazardous Waste Shipper Certification - Advanced Course 2					X ³	
020078 Mixed Waste Shipper Certification - Advanced Course 4					X ³	
035010 Waste Designation					X ⁴	X
035012 Waste Designation Qualification						X
035020 Facility Waste Sampling and Analysis					X ⁵	
035100/035110 Container Waste Management			X	X		
035120/035130 Waste Management Administrative					X	
UNIT/BUILDING SPECIFIC COURSES:						
400810/400815 WESF Facility Orientation (at facility > 7 days)	X	X	X	X	X	X

Course Requirements by Waste Worker Category						
Course # / Course Title	All Employees	General Worker	Advanced General Worker	General Manager	General Shipper	Waste Designator
03E025 Facility Emergency and Hazards Information Checklist	X	X	X	X	X	X
402210 WESF Emergency Procedure/ Abnormal Plant Conditions (General-Radiation Worker) (depending on job assignment)	X	X		X	X	X
402215 WESF Emergency Procedure/ Abnormal Plant Conditions (General-Non Radiation Worker) (depending on job assignment)	X					
400600 WESF Emergency Procedure/ Abnormal Plant Conditions (Process) (depending on job assignment)	X	X	X	X		
400620 WESF Emergency Procedure/ Abnormal Plant Conditions (Technical)				X		
400470 WESF Manipulator Operator Qualification			X ⁶	X ⁷		
400480 WESF Storage Pool Operations			X ⁶	X ⁷		
400500 WESF Surveillance Operations			X ⁶	X ⁷		

Notes:

- 1 Visitors/Vendors/Subcontractors working on the Hanford Site 7 days or less.
- 2 On-Call Building Emergency Director only.
- 3 Current certification on course 020078 supersedes re-certification on course 020159.
- 4 One-time course only. No re-qualification.
- 5 WMH sampling team and those who sample only.
- 6 Nuclear Chemical Operators only.
- 7 Configuration Control Authorities only. No re-qualification required.

ATTACHMENT C

**WESF DANGEROUS WASTE WORKERS
EMPLOYEE NAMES AND TITLES**

J.L. PENNOCK		P.T. SAUERESSIG		W.W. WINGFIELD		M. KAVIANI	
Name	Title	Name	Title	Name	Title	Name	Title
General Worker		General Worker		General Worker		General Worker	
		---	Transporter	SL Beightol	NCO		
				GW Johnson	NCO		
				AB Marsh	NCO		
				LJ Phillips	NCO		
				PG Purdy	NCO		
Advanced General Worker		Advanced General Worker		Advanced General Worker		Advanced General Worker	
RO Bell ¹	Haz Mat Spec	WB Cook	NCO			RJ Williams ²	RCT 1 st Line
P Gonzalez ¹	Haz Mat Spec	GL Garman	NCO				Supvr
		LL Lanman	NCO				
		RA Shepard	NCO				
		JE Wabaunsee	NCO				
General Manager		General Manager		General Manager		General Manager	
JL Pennock	Facility Mgr	PT Saueressig	OBED/CCA	RJ Townley	OBED/CCA	M Kaviani	Rad Control
FM Simmons	Environ		/Team		/Team		Mgr
	Compliance		Coordinator		Coordinator		
	Officer						
General Shipper		General Shipper		General Shipper		General Shipper	
RO Bell ¹	Haz Mat Spec						
P Gonzalez ¹	Haz Mat Spec						
Waste Designator		Waste Designator		Waste Designator		Waste Designator	
RO Bell ¹	Haz Mat Spec						
P Gonzalez ¹	Haz Mat Spec						

¹ Waste Management Hanford (WMH) personnel.² PHMC contracted individuals. Contact Team Coordinator for names performing work on specific dates.³ Designated to survey waste storage units and < 90 day accumulation units.

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WASTE ENCAPSULATION AND STORAGE FACILITY DANGEROUS WASTE TRAINING PLAN

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