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ENGINEERING CHANGE NOTICE

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Page 1 of 2

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Proj.
ECN

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SDD/DD	<input type="checkbox"/>	Selamic/Stress Analysis	<input type="checkbox"/>	Tank Calibration Manual	<input type="checkbox"/>
Functional Design Criteria	<input type="checkbox"/>	Stress/Design Report	<input type="checkbox"/>	Health Physics Procedure	<input type="checkbox"/>
Operating Specification	<input type="checkbox"/>	Interface Control Drawing	<input type="checkbox"/>	Spares Multiple Unit Listing	<input type="checkbox"/>
Criticality Specification	<input type="checkbox"/>	Calibration Procedure	<input type="checkbox"/>	Test Procedures/Specification	<input type="checkbox"/>
Conceptual Design Report	<input type="checkbox"/>	Installation Procedure	<input type="checkbox"/>	Component Index	<input type="checkbox"/>
Equipment Spec.	<input type="checkbox"/>	Maintenance Procedure	<input type="checkbox"/>	ASME Coded Item	<input type="checkbox"/>
Const. Spec.	<input type="checkbox"/>	Engineering Procedure	<input type="checkbox"/>	Human Factor Consideration	<input type="checkbox"/>
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Document Number/Revision

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Date

Signature

Date

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Cog. Mgr. J. E. Bramson

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11/23/99

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DEPARTMENT OF ENERGY

Signature or a Control Number that tracks the Approval Signature

ADDITIONAL

Plutonium Finishing Plant Dangerous Waste Training Plan

G.E. Entrop, BWHC
Richland, WA 99352
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Abstract:

This training plan describes general requirements, worker categories, and provides course descriptions for operation of the PFP waste generation facilities, permitted treatment, storage and disposal (TSD) units, and the 90-Day Accumulation Areas.

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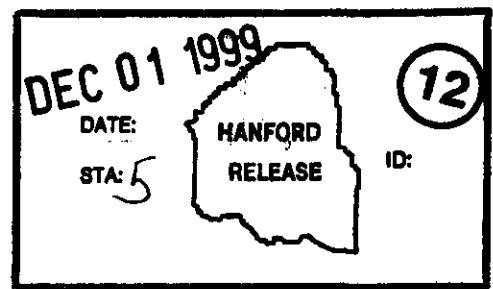
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HNF-SD-WM-TR-028, Rev. 3

PLUTONIUM FINISHING PLANT DANGEROUS WASTE TRAINING PLAN

APPROVALS


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11/23/99
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1.0 PURPOSE

This document outlines the Dangerous Waste Training Plan (DWTP) for the Plutonium Finishing Plant (PFP) organization. In accordance with *Washington Administrative Code* (WAC), Chapter 173-303, Dangerous Waste Regulations, a written training plan is required for the operation of dangerous waste management units. This PFP 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; the *Code of Federal Regulations* (CFR), Chapter 1, 49 CFR 172.700, Subpart H, Training; and 29 CFR 1910.120 and 1910.1200, Occupational Safety and Health Administration (OSHA) Training Requirements.

2.0 SCOPE

This DWTP applies to personnel who perform work at, or in support of the PFP Facilities. The WAC 173-303-200, "Accumulating Dangerous Waste On-Site," requires compliance with WAC 173-303-330, "Personnel Training". This training plan complies with WAC 173-303-330. This plan, and the names of personnel assigned to DWTP worker categories, 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 personnel qualified in accordance with this training plan, if working with or around dangerous waste. PFP houses two treatment, storage and disposal (TSD) units and 90-Day Accumulation Area(s), which are managed as generator units under WAC 173-303-200. Dangerous waste management units covered by this plan include:

- 241-Z Waste Storage and Treatment Facility Tank Systems;
- Cementation Process Dangerous Waste Treatment and Storage Facility (Permit pending); and
- 90-Day Accumulation Area(s) at the PFP buildings;

This training plan describes general requirements, worker categories, and provides course descriptions for operation of the PFP waste generation facilities, permitted treatment, storage and disposal (TSD) units (PFP Facility), and the 90-Day Accumulation Areas. Training records associated with personnel identified in this plan are maintained in paragraphs 5.6.1, 5.6.2, and 5.6.3 of this plan. This plan also addresses the TSD and hazards communication training requirements associated with OSHA regulations and 29 CFR 1910.120 and 1910.1200.

3.0 DEFINITIONS

None.

4.0 RESPONSIBILITIES

A dangerous or mixed waste generator shall provide personnel training as directed by WAC-173-330. Fluor Daniel Hanford (FDH) Site Training is responsible for developing the program of classroom instruction. Facility managers are responsible for developing a program for unit/building-specific training supplementing the general Hanford Site classroom program.

4.1 PFP Director

The PFP Director has the overall responsibility to meet applicable training requirements of WAC 173-303-330 and Condition II.C of the *Hanford Facility RCRA Permit*. To meet the requirements in WAC 173-303-330(1)(a), the training director position is described in the *Hanford Facility Dangerous Waste Permit Application, General Information Portion* (DOE/RL-91-28, Chapter 8.0).

4.2 Training Manager

The training manager has overall responsibility for establishing, conducting, and administering the training program for the PFP, and maintaining the Training Matrix (TMX) system and lists to ensure personnel are trained to meet assigned jobs.

4.3 Facility Management

All managers are responsible for the following:

- Determining required training for all personnel assigned to the PFP, as required by job assignment;
- Ensuring that personnel assigned to PFP receive required initial training, continuing training, and retraining as needed to be qualified to perform assigned duties in dangerous waste management;
- Maintaining up-to-date personnel training records for assigned personnel; and
- Addressing employee deficiencies with memo to file documenting the resolution to the deficiency.

4.4 Training Personnel

All training personnel are responsible for the following:

- 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
- Developing and conducting training on new and existing systems or equipment.

4.5 Personnel

All PFP and support personnel are responsible for the following:

- Working with their managers to define applicable training.
- Completing necessary training to gain/maintain qualifications.

5.0 TRAINING PROGRAM PROCEDURE

5.1 General Training Requirements

Project Hanford Management Contract (PHMC) training organizations are responsible for developing the overall Hanford Site training program of classroom instruction and for maintaining training records. The unit/building management is responsible for directing a program for facility-specific training supplementing the general Hanford Site classroom program. General requirements of this training program include the following.

- a. Instructing personnel to perform duties in compliance with the Dangerous Waste Regulations, WAC 173-303.
- b. Instruction by a person knowledgeable of dangerous waste management procedures that includes training relevant to the employee's position.
- c. A facility-specific program that includes 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 contingency plan and the emergency procedures maintained at the unit/building will satisfy the spill response and emergency procedures review.
- d. New employees must receive training within six months of employment or transfer, and must be supervised by a trained person until completion of training.
- e. Employees must receive appropriate annual refresher training.
- f. Employees have six (6) months to complete any revised or new training imposed by this plan.

5.2 Training Plan Content Requirements

In accordance with the requirements in WAC 173-303-330(2), a training plan must contain the following.

- a. For each position related to dangerous waste management at the facility, the job title, the job description, and the name of the employee filling each job. 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 5.3, 5.4, 5.5, and 5.6 describe how these requirements are met for PFP.

5.3 Job Title, Job Description, and Names of Employees

Names of personnel who are associated with dangerous waste management at PFP Facilities are maintained and updated by the Training Records Management Specialist. Personnel are placed into the following six categories to properly assign the correct training that is commensurate with their duties and responsibilities. Personnel duties and responsibilities may overlap between categories. When overlaps occur, personnel will complete appropriate training pertaining to courses applicable from each category. The determining factor for placing specific personnel within any of the categories is the corresponding job duties. The categories are as follows:

- a. All Employee;
- b. General Worker;
- c. Advanced General Worker;
- d. General Manager; and
- e. General Administrator.

All personnel are assigned a job title (from the salaried nonexempt or bargaining unit classifications) or position (from the exempt classifications). The job or position descriptions include applicable requisite skills, work experience, education, and other qualifications, and a brief list of duties and/or responsibilities for each job title or position. Information regarding work experience, education and other qualifications required for each position is maintained by Fluor Daniel Hanford Company, Human Resources Department.

If personnel assigned duties as one of the **All** worker categories (General Worker, Advanced General Worker, General Manager, **General Administrator**) lapse in their training, they must be supervised by a trained person until completion of retraining. Upon requalification, the personnel could resume previously assigned duties. 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.

Table 1 provides the duties corresponding to 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 facility. The responsibilities for personnel categorized as General Workers, Advanced General Workers, General Managers, and **General Administrators** are provided because these categories are associated directly with the safe and compliant management of dangerous and/or mixed waste at the PFP buildings.

Because personnel categorized as 'All Employee' in Table 1 are not related directly to the safe and compliant management of dangerous and mixed waste at PFP, their names are not identified in this Dangerous Waste Training Plan. According to HNF-PRO-459, *Environmental Training*, Section 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 positions, need not be identified in a training plan."

A list of Advanced General Workers, General Managers, and **General Administrators** is maintained by PFP Training.

Table 1. Worker Categories.

Worker Categories	Generator and TSD Job Duties	PFP Job Titles/Classifications ¹
All Employee: (PFP personnel, or non-PFP personnel)	Not categorized as a General Worker, Advanced General Worker, General Manager, General Administrator . 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 Visitors Other Non-Hanford Subcontractors
General Worker (PFP personnel, or non-PFP personnel)	Personnel with limited dangerous waste management duties, such as activities associated with the generating and depositing in appropriate containers of dangerous waste from facility maintenance or modification. Work under the direction of an Advanced General Worker, General Manager, or General Administrator .	<ul style="list-style-type: none"> Maintenance Personnel Transporter Lab Personnel RCT⁴ Nuclear Chemical Operator SOE⁵ Sub-contractor Maintenance Personnel
Advanced General Worker (PFP personnel, only) ³	Manage dangerous waste in tanks, containers, and 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. The TSD unit-specific duties include operation and surveillance of tank systems, container storage units and containment buildings, 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 and plans.	<ul style="list-style-type: none"> Hazardous Materials Specialist² Environmental Engineer² Waste Management Engineer² Nuclear Chemical Operator/RCT assigned to conduct surveillance in TSD units, and tanks and systems Engineer
General Manager (PFP personnel, only) ³	Environmental Compliance Officer (ECO), someone qualified as the Building Emergency Director (BED), or someone who directs Advanced General Workers in accumulation of dangerous waste management activities. Responsible for the accountability and directing of employees during dangerous waste emergency events.	<ul style="list-style-type: none"> BED/Alternates Manager, or Supervisor of Advanced General Workers ECO
General Administrator (PFP personnel, only) ³	Preparation and shipment of dangerous or mixed 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. Performs or completes waste designations at the facility	<ul style="list-style-type: none"> HMS⁶ Engineer OPS Specialist Safeguards & Security Specialist WMH Waste Designator matrixed to PFP

¹ Duties and responsibilities of personnel must be compared to the table.

² Designated individuals, if assigned per job scope/duties.

³ May include Waste Management Hanford Company (WMH) personnel matrixed to PFP.

⁵ Stationary Operating Engineer

⁶ Hazardous Material Specialist

⁴ Radiological Control Technician

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. Information regarding work experience, education and other qualifications required for each position is maintained by the Fluor Daniel Hanford Company, Human Resources Department.

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 Employee, General Worker, Advanced General Worker, General Manager, and ~~General Administrator~~.

5.3.1 All Employee

Personnel included in this position are those who are not classified as one of the other ~~job~~ positions and have no duties or responsibilities directly associated with dangerous waste management. Personnel in the All Employee category are prohibited from performing duties or responsibilities associated with the management of waste in accumulation/storage containers at PFP. All personnel have the responsibility to report spills and releases that they discover, in addition to any evacuation or take cover actions in response to specific incidents that may occur.

Typical personnel titles in this position include administrative personnel, secretaries, clerks, engineers, managers, and support organizations, who tour or provide oversight. Most visitors, categorized as All Employee, generally tour, provide oversight, or are brought onsite for interviews. Other non-Hanford Site facility personnel who gain access to complete work in controlled areas, but do not become involved in the management of dangerous wastes, are categorized as All Employees.

5.3.2 General Worker

PFP personnel or non-PFP personnel with waste management duties and responsibilities limited to the initial generation of dangerous or mixed waste and placing that waste into a pre-approved container are categorized as General Worker. The pre-approved container can include one in a satellite accumulation area, 90-day accumulation area, or TSD storage unit. These personnel may generate dangerous or mixed waste while working on a non-RCRA system (e.g., building maintenance) or on a TSD unit conducting maintenance or modification on facility systems. Personnel with limited dangerous waste management duties, such as activities associated with the generation of dangerous waste or facility maintenance or modification, are categorized as General Worker.

Personnel categorized as General Worker could be assigned duties and responsibilities for the following:

- Emergency Planning and Community Right-to-Know Act (EPCRA) Reporting responsibilities/point-of-contact;
- Completing radiological surveys of dangerous or mixed waste;
- Placing waste they generate into pre-approved containers and filling out log sheets where applicable;
- Moving containers or loading packaged containers onto trucks;
- Responding to a spill or release of known contents where duties and responsibilities are limited to containing the spill/release, returning the container to an upright position, and/or placing the known spilled material or waste into a pre-approved container;
- Applying container markings or labels based on direction from an Advanced General Worker, General Manager, or General Shipper, or Waste Designator; and
- Responding to regulatory agency compliance inspectors' questions about waste management practices.

Personnel who function as General Worker may include, but are not limited to the following:

- Maintenance Personnel,
- Sub-contractor Maintenance personnel,
- Nuclear Chemical Operators,
- SOE's
- RCT's, and
- Transporters.

5.3.3 Advanced General Workers

Advanced General Workers may have the following job duties and responsibilities related to dangerous waste management:

- Perform PFP dangerous waste management activities in accordance with current operating procedures;
- Perform waste sampling as required by procedure;
- Complete waste inventories;
- Conduct inspections of the 90-Day Accumulation Area and SAA's;
- Assist a certified shipper in properly identifying hazardous material, select appropriate packaging, identify appropriate communication requirements and supervise those responsible for actually conducting those activities.
- Ensure that the dangerous waste has been properly secured in the transportation vehicle;
- Respond to spills and releases of unknown materials or wastes according to approved procedures;
- Operate dangerous waste tank systems according to established operating procedures;

- Conduct surveillance of waste treatment and tank systems, container storage areas, and the containment building;
- Respond to off-normal and/or waste related emergency conditions according to established procedures; and
- Receive, segregate, sort, inventory, store, and stage dangerous waste.

5.3.4 General Manager

Various types of managers are included in this position. In addition, PFP personnel assigned to unit/buildings can be categorized as General Managers if they have direct reporting personnel who perform 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 or mixed waste management and are required to take the same courses.

The following managers are included within this position:

- (1) Building Emergency Directors,
- (2) the Environmental Compliance Officer for the unit/building, and
- (3) immediate managers of General Workers and Advanced General Workers (i.e., operations managers).

5.3.4.1 Building Emergency Director/Alternates

Job duties and responsibilities of the PFP BED/Alternate(s) with regard to dangerous waste management include the following:

- Function as the BED/Coordinator, as defined in WAC 173-303-360;
- Determine if a dangerous waste contingency plan has been implemented during the course of an incident or process upset;
- Ensure all reports to the Washington State Department of Ecology have been made after an incident or process upset has occurred; and
- Become thoroughly familiar with PFP building contingency plans, operations, activities, location and properties of all dangerous wastes handled, locations of all records, and the facility layout.

5.3.4.2 Environmental Compliance Officer

Job duties and responsibilities of the PFP Environmental Compliance Officer with regard to dangerous waste management include the following:

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

5.3.4.3 Managers/Supervisors of Advanced General Workers

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

- Maintain control over PFP operations in accordance with established operating procedures and applicable environmental regulations;
- Ensure compliance with PFP operating limits and specifications related to waste management units;
- Ensure appropriate dangerous waste management documentation is maintained;
- Respond to and provide remedial guidance and decisions for operational anomalies, off-normal conditions, and equipment malfunctions according to established procedures;
- Notify the Emergency Director of any unplanned releases to the environment; and
- Coordinate the recovery from, measurement of, and re-establishment of control of unplanned releases to the environment and other emergency conditions.

5.3.5. General Administrator

The General Administrator position supercedes the former General Supervisor and Waste Designator positions. General Administrators in the RCRA training program are categorized as Hanford Facility Personnel who:

- decide which waste requires sampling and analysis to properly characterize the waste, or approve sampling and analysis plans or approve waste analysis plans; or
- prepare waste acceptance documentation for Waste Management Federal Services of Hanford, Inc. (WMFI) Solid Waste TSD units (i.e. Central Waste Complex (CWC), Waste Receiving and Packaging (WRAP) facility, T-Plant and Low Level Burial Grounds); or
- oversee waste movement documentation accuracy for both onsite and offsite shipments of dangerous or mixed waste on roadways; or
- complete waste designations.

For the duty pertaining to oversight of waste movement documentation accuracy, there is no distinction in this position based upon where a dangerous or mixed waste movement will initiate, terminate, or which road the movement will travel along.

5.4 Training Course Requirements

Courses applicable to all personnel categorized as All Employee, General Worker, Advanced General Workers, General Managers, and General Administrators are

listed in Attachment A. The course descriptions contain additional information concerning the courses. Attachment B, which lists the **worker** categories, and the required courses is used to determine the courses required for each worker. Based on the categorization of personnel to the worker categories, the appropriate courses are chosen.

Training requirements for individual personnel are tracked in the training Matrix (TMX) and maintained by the Training Administrator.

5.5 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), certain personnel are trained on emergency equipment, emergency systems, and emergency procedures at 90-day accumulation areas, 90-day tank systems and all TSD units.

The on-scene incident commander on the Hanford Site is the Hanford Fire Department (HFD). For minor spills or releases as discussed in the Hanford Facility Contingency Plan (DOE\RL-93-75) or for incidental releases as defined under 29 CFR 1910.120, the HFD delegates response activities when the spill or release does not warrant HFD involvement. These types of responses are conducted under delegated authority from the HFD within unit/building procedures and documents and are not within the scope of emergency responder training in DOE\RL-93-75 or 29 CFR 1910.120.

The RCRA training program allows for unit/building management to evaluate the elements of WAC 173-303-330(1)(d) to the specific type of RCRA waste management units being managed. Training elements for a given unit/building specific training program will depend on the type of unit. For example, one of the WAC 173-303-330(1)(d) elements concerns the "key parameters for automatic waste feed cut off". This provision is not applicable to TSD unit operations concerning container storage since there is no waste feed to cut off, just containers being stored. Table 2 identifies the elements of WAC 173-303-330(1)(d) for the PFP Facility.

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

WAC 173-303-330(1)(d) Criteria	Emergency Response	PFP 90-Day Accumulation Area	PFP Tank Systems	PFP Containment Building
Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment		Yes	Yes	Yes
Key parameters for automatic waste feed cut-off systems		No	Yes	No
Communications or alarm systems		Yes	Yes	Yes
Response to fires or explosions		Yes	Yes	Yes
Response to groundwater contamination incidents		No	No	No
Shutdown of operations		No	Yes	Yes

5.6 Training Records

5.6.1 Location of Training Records

Training records, as described in WAC 173-303-330, consist of documentation that shows training has been completed. Hanford Site facility training records include both electronic data storage and hard copies. The electronic data storage information is 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 TMX system. A Training Field File for each employee is maintained by the employee's facility manager.

The electronic data storage record will contain the course number, course title, date of attendance, and any refresher dates. Hard copies of training records that are sent to the training record organization for entry on the TMX 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 data storage and hard copy training records of former employees are kept for at least three years from the date the employee last worked at PFP.

5.6.2 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 through computers at PFP and may require a representative from the training records organization to access the TMX system for this information.

5.6.3 Determining Current Training Status

After an electronic data storage training record is obtained, it will be compared to information in this plan. This plan can be used to determine the training status of all personnel in all worker categories identified in this plan that relate to the *Resource Conservation and Recovery Act (RCRA)*. The electronic data storage training record coupled with this training plan will give any inspector the ability to quickly determine the training status of personnel in the field.

5.7 Updating the Training Plan

The Dangerous Waste Training Plan will be reviewed annually and updated as necessary by the PFP Training Department.

5.8 Resource Conservation and Recovery Act Course Descriptions

Table 3 provides the courses and titles driven by the Dangerous Waste Regulations (WAC 173-303) Requirements. Attachment B provides relationship between waste workers categories and course numbers applicable for their responsibilities.

Table 3. Courses Driven by WAC 173-303 Requirements

Course Number	Course Title
000001	Hanford General Employee Training
000091	Visitor/Vendor Training (video)
200700	PFP Facility Orientation
200330	PFP Facility Emergency Procedure/Abnormal Plant conditions
02006G	Waste Management Awareness
02028B	Building Emergency Director ICP Communicator Training
038100	Incident Command Post – Operations Training
035010	Waste Designation
035012	Waste Designation Qualification
035020	Facility Waste Sampling and Analysis
035100	Container Waste Management – Initial
035110	Container Waste Management – Refresher
035120	Waste Management Administrative – Initial
035130	Waste Management Administrative – Requalification
03E043	Building Emergency Plan for PFP

5.9 U.S. Department of Transportation Training Requirements

Table 4 lists the courses driven by the *Code of Federal Regulations (CFR)*, Chapter 49 Parts 100 through 199 (49 CFR 100-199). These courses and their intended audiences are included in both Attachments A and B.

Table 4. Courses Driven by the 49CFR Parts 100 - 199

Course Number	Course Title
020064	Basic Hazardous Materials Transportation Training - Module 1
020068	Basic Hazardous Waste Training - Module 2
020059	Hazardous Materials Operations Training - Module 3
020067	Hazardous Materials Shipper Certification - Advance Course 1
020159	Hazardous Waste Shipper Certification - Advanced Course 2
020069	Radioactive Material Shipper Certification - Advance Course 3
020078	Mixed Waste Shipper Certification - Advance Course 4
020079	IATA: Transport of Dangerous Goods Shipper Certification Training

The three levels of training for hazardous materials employees are as follows:

1. Those that do: This level of training is provided for those hazmat employees who do not make decisions of determination, but make decisions that verify accuracy and consistency with the regulations. These employees would be involved in activities such as packaging, marking and labeling of packages, completing shipping papers, loading and unloading, and transporting hazardous materials, waste and radioactive materials. Their responsibility would include verifying that proper shipping names are acceptable as indicated in the hazardous material table (HMT, 49 CFR 172.101), that the markings and labels applied correspond to the HMT, and that the packaging has been tested to the required level of the hazard.
2. Those that decide: This level of training is provided for those hazmat employees who are responsible for assisting a certified shipper to properly identify hazardous material, select appropriate packaging, identify appropriate communication requirements, and supervise those responsible for actually conducting those activities.
3. Those that certify: This level of training is provided for those hazmat employees who are designated to be authorized shippers and validate that all aspects for 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.

5.10 OSHA Training Requirements

This section defines the basis for training personnel in accordance with Occupational Safety and Health Administration (OSHA) 29 CFR 1910.120(p). Per this regulation, personnel working at a RCRA-permitted hazardous waste site or TSD unit whom have the potential to be exposed to hazardous substances or waste must receive a minimum of 24 hours of initial instruction and eight hours annually in safe operation of waste activities. This requirement can be met at the Hanford Site by documented completion of either the 24-Hour RCRA/TSD Hazardous Waste course (# 031110) or the 40-Hour Hazardous Waste Worker (Field) course (# 031220), and their associated refresher course, 8-Hour Hazardous Waste Worker Refresher (# 032020), prior to being allowed access to TSDs containing dangerous waste. Other approaches are appropriate if documented.

PFP houses two treatment, storage and disposal (TSD) units which are managed as generator units under WAC 173-303-202.

- 241-Z Waste Storage and Treatment Facility Tank Systems (permitted);
- Cementation Process systems (in process of being permitted).

The 24-Hour TSD training will be applied for personnel who:

- a. Enter the 241-Z Waste Storage and Treatment Facility Tank Systems and the Cementation Process systems, when hazardous/dangerous waste is present because of the potential exposure to the dangerous waste;
- b. Will be exposed to waste during sampling and handling of dangerous waste samples from the TSD units;
- c. Work on ancillary equipment associated with the TSD units and who might be exposed to dangerous waste from the unit (e.g., filter change out);
- d. May respond to or contact the dangerous waste if a spill or release occurs; and
- e. Will provide direct support to activities that involve items containing TSD waste (based on worker assignments, this applies to selected Radiological Control Technicians and Maintenance Personnel). The current 24-hour TSD training will be required, based on individual work assignments.

Because the TSD areas are radiation areas, personnel working in these areas are required to take the applicable radiation protection training. Personnel working with chemicals, but with no potential to be exposed to dangerous waste from the TSDs receive training consistent with 29 CFR 19190.1200 (Haz/Com Training) requirements. The 24-Hour training required in 29 CFR 1910.120(p) is not required for working with waste in the satellite accumulation or 90-Day Accumulation Areas. Employees who have minimal (low risk) exposure or low probability of exposure to hazardous substances are required to take hazards communication (Haz/Com) training consistent with their job assignments and duties to meet OSHA Haz/Com training requirements (29 CFR 1910.1200). Per 29 CFR 1910.120(a)(1), the hazardous waste operations (HAZWOPER) training addressed in 29 CFR 1910.120 does not apply if the employer can demonstrate that the operation does not involve

employee exposure or the reasonable possibility for employee exposure to safety or health hazards.

Individuals preparing the technical work plans will identify to the supervisors any work where a person might be exposed to dangerous waste from one of the TSD units. Personnel training records at the PFP Buildings are provided to the work group supervisors and managers, who ensure that personnel assigned to work where they have the potential to be exposed to dangerous waste from one of the TSDs have the proper training. For long-term control, determination of the need for training required in 29 CFR 1910.120 will be built into the Employee Job Task Analysis for routine operations and into the Job Hazard Analysis for non-routine activities.

6.0 REFERENCES

HNF-PRO-459 revision O, Environmental Training, September 23, 1997.

HNF-PRO-166 revision O, Transportation Safety Training, September 19, 1997.

FSP-PFP-1121, Plutonium Finishing Plant Training Administration.

Code of Federal Regulations, Chapter 29, Parts 1910.120 and 1910.1200, U.S.

Occupational Safety and Health Administration, Federal Registrar, Washington D.C.

Code of Federal Regulations, Chapter 49, Parts 100 through 199, U.S. Department of Transportation, Federal Registrar, Washington D.C.

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

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

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

7.0 ATTACHMENTS

Attachment A provides course descriptions for All employees, General Worker, Advanced General Workers, General Managers, and General Administrators.

Attachment B provides relationship between Waste Worker Categories, Course Numbers and Course Titles required for each position.

ATTACHMENT A COURSE DESCRIPTIONS

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
Target Audience	All Hanford personnel
Frequency	Annual

Title	000091 Visitor/Vendor Training (Video)
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
Target Audience	Visitors/vendors/subcontractors on site 7 days a week
Frequency	None, unless badge expires.

Title	200700 PFP Facility Orientation
Description	This is required training for unescorted access to the PFP Facility. The course provides information on the PFP 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, FSP-PFP-5-8
Target Audience	Everyone requiring unescorted access to the PFP
Frequency	One time

Title	200330 PFP Emergency Procedures/Abnormal Plant Conditions
Description	This is a written exam given in conjunction with Facility Emergency and Hazard Information Checklist (FEHIC)/Building /emergency Plan (BEP) training.
Mandating Document(s)	DOE Order 5480.20A, FSP-PFP-1121
Target Audience	Advance Workers and General Managers
Frequency	12 months

Title	02006G Waste Management Awareness
Description	Course introduces workers to federal laws governing chemical safety in the work place. The course provides the hazardous material/waste worker with the basic fundamentals for safe use of hazardous materials and initial accumulation of dangerous or mixed waste in containers. The concepts covered in the course instruct personnel on specific waste generation procedures and requirements which includes: (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/US Army Corps of Engineers letter to Ecology responding to Consent Order No. DE 94NM-063, dated April 14, 1994, RCRA Title 40 CFR 300.110 and 300.120 Hanford Facility RCRA Permit, General Conditions II.C.1 and II.C.4 WAC 173-303-330(1), -340, -350, and -360
Target Audience	Hanford Facility personnel categorized as a General Worker, Advanced General Worker, and General Manager. Non-Hanford Facility Personnel categorized as General Workers. Other courses may provide equivalent training so that credit for this course is provided when the electronic data storage training record is generated.
Frequency	One time only. Justification: Annual training is not required for 02006G because unit/building specifics are adequately covered through the 03E043 course, 03E111 or 03E112 course, 035110 course, or equivalent.

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), -340, -350, and -360
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. The BED can function over TSD units or generator activities.
Frequency	Initial (Retrained annually by 037510 Building Emergency Director/Warden Requalification)

Title	038100 Incident Command Post – Operations Training
Description	Aid BED and ICP communicators in responding to site emergencies. Prepare BED and ICP communicator to participate in the ICP. The BED/ICP module is 3 hours. At completion of module, will participate in table top drill. Drills are followed by a critique and summary.
Mandating Document(s)	HNF-IP-424; DOE/RL 0223; DOE ORDER 5500.3A; RLEP 1.1
Target Audience	Key ICP Responders; GW's, AGW's, GM's, with BED/ICP responsibility
Frequency	12 Months; Prerequisite to Course 02028B for BED's

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
Target Audience	Advance General Workers, General Managers, General Administrators
Frequency	One-time only Justification: The Waste Designation Qualification course annually qualifies those personnel who designate waste. General Administrators , Advance General Workers and General Managers 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 to WAC 173-303
Mandating Document(s)	WAC 173-303-330(1), -070, and -080 through -100
Target Audience	Waste Designators
Frequency	every 12 months

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. This course 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), -070, -110, and -300
Target audience	General Administrators
Frequency	One time only. Justification: In most cases, the General Administrator will utilize resources from outside organizations to physically acquire samples. In addition, the General Administrator 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 or mixed waste, and preparation of packages for final destination. This course does not cover waste management aspects pertaining to other dangerous waste management units such as tank systems, surface impoundments, containment buildings, landfill, etc.
Mandating Document(s)	WAC 173-303-330(1), -630, -200(1) and Waste Minimization
Target Audience	Advanced General Workers and General Managers categorized because they are immediate managers/supervisors of Advanced General Workers who manage containers of dangerous or mixed waste.
Frequency	Initial (Retrained annually by 035110 Container Waste Management Training - Refresher)

Title	035110 Container Waste Management - Refresher
Description	Refresher Course for 035100
Mandating Document(s)	WAC 173-303-330(1), -630, -200(1), and waste minimization
Target Audience	Advanced General Workers and General Managers who are categorized because they are immediate managers/supervisors of Advanced General Workers who manage dangerous or mixed waste in containers.
Frequency	Annual

Title	035120 Waste Management Administration - Initial
Description	Course is designed for personnel preparing to become shippers of dangerous and/or mixed waste. This 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
Target Audience	General Administrators
Frequency	Initial (Retrained annually by 035130 Waste Management Administration - Refresher)

Title	035130 Waste Management Administration - Regualification
Description	Refresher of course 035120
Mandating Document(s)	WAC 173-303-330(1), -630, -200, -210, -220, -380, and -390
Target Audience	General Administrators
Frequency	Annual

Title	03E043 Building Emergency Plan
Description	Classroom presentation in conjunction with the facility & emergency hazards information check list (a-6000-784). Source control of a release of chemical hazards associated with each RCRA waste management system job assignment, as covered by a Building Emergency Plan or Supplemental Contingency Plan. The training is conducted by a site supervisor, manager, or a designated individual. The training covers the use of building-specific information, a reference to the facility's fire and emergency response requirements, including evacuation routes, main feed cut-off, communication and alarm systems, and response to fires.
Mandating Document(s)	HNF-IP-1018; HNF-PRO-459 DOE/RL-94-02 WAC 173-303-330(1)(d), -340, -350, and -630.
Target audience	Advanced General Workers and General Managers
Frequency	Annual

Title	03E044 Onsite Routine ROR Shipping For Radiological Control Organization
Description	This course covers site-03 expected onsite routine radiocesium shipment requirements for radiological control technicians. Requirements for determining activity limits, marking, labeling, surveying and transporting radioactive material are covered. Critical values and scope determine activity limits determine activity of the material to be shipped. Requirements for the material marking and labeling the package surveying the package, reviewing CFR49 requirements authorizing the shipment, transporting the package, completing the paperwork for the shipment.
Applicable Documents	49 CFR 172.704 49 CFR 173. HNF-PRO-157
Target Audience	RCLO General Workers
Training Frequency	24 Months

Title	020064 Basic Hazardous Materials Transportation Training - Module 1
Description	Course provides personnel with a thorough understanding of the DOT regulations. This course provides the participants with basic requirements needed to make decisions affecting the safe transportation of hazardous materials. This course is a prerequisite for hazardous materials shipper certification advance course 1 and Radioactive materials shipper certification advance course 3.
Mandating Document(s)	49 CFR 172.702, 49 CFR 177.816 and HNF-PRO-166
Target Audience	General Administrators of dangerous or mixed waste on roadways anywhere on the Hanford Site.
Frequency	Every 36 Months

Title	020066 Basic Hazardous Waste Training - Module 2
Description	Half-day course intended to give participants a recognition and awareness level understanding of hazardous waste transportation.
Mandating Document(s)	49 CFR 172.702, 49 CFR 177.816 and HNF-PRO-166
Target Audience	General Administrators of dangerous or mixed waste on roadways anywhere on the Hanford Site.
Frequency	36 Months

Title	020059 Hazardous Materials Operations Training - Module 3
Description	Two-day course is designed to provide participants with basic determination skills for radioactive material transportation.
Mandating Document(s)	49 CFR 172.702, 49 CFR 177.816 and HNF-PRO-166
Target Audience	General Administrators of dangerous or mixed waste on roadways anywhere on the Hanford Site.
Frequency	36 Months

Title	020067 Advance Course 1 - Hazardous Materials Shipper Certification
Description	Must be completed by all employees who as a part of their job assignment must have signature authority to sign the appropriate shipping documentation as prescribed in 49 CFR Part 172.200. This includes signing Hazardous Material Shipment Records (HMSR), Radioactive Shipment Records (RSR's) and Uniform Hazardous Waste Manifests (UHW).
Mandating Document(s)	49 CFR 172.702, 49 CFR 177.816 and HNF-PRO-166
Target Audience	General Administrators of dangerous or mixed waste on roadways anywhere on the Hanford Site.
Frequency	36 Months

Title	020159 Advanced Course 2 - Hazardous Waste Shipper Certification
Description	Course introduces personnel to identify shippers' 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 172.702, 49 CFR 177.816, HNF-PRO-166 and WAC-173-303-(1), -180, -190, -370
Target Audience	General Administrators of dangerous or mixed waste on roadways anywhere on Hanford Site
Frequency	36 Months

Title	020069 Advance Course 3 - Radioactive Material Shipper Certification
Description	Three-day application of 49 CFR as it pertains to certification of radioactive material shipments on and off the Hanford Site.
Mandating Document(s)	49 CFR 172.702, 49 CFR 177.816 and HNF-PRO-166
Target Audience	General Administrators of dangerous or mixed waste on roadways any where on the Hanford Site.
Frequency	36 Months

Title	020078 Advanced Course 4 - Mixed Waste Shipper Certification Training
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	General Administrators
Frequency	36 Months

Title	020079 IATA: Transport Of Dangerous Goods Shipper Certification Training
Description	This course provides the successful participant with certification for signature authority of shippers declarations of dangerous goods transported by air in 100% compliance with IATA regulations.
Mandating Document(s)	IATA: Transport Of Dangerous Goods Regulations, Section 1.5
Target Audience	General Administrators
Frequency	24 Months

Title	031110 24-Hour RCRA/TSD Hazardous Waste
Description	Provides information for the safe work operation of RCRA TSD facilities regulated under 40 CFR 264 and 265, and pursuant to 29 CFR 1910.120.
Mandating Document(s)	29 CFR 1910.120, DOE 5480.4, DOE 5483.1A, and 40 CFR 311
Target Audience	TSD workers and Safety, operations, maintenance, environmental technicians, and management personnel.
Frequency	Initial (Retrained annually by 032020, 8-Hour Hazardous Worker Refresher)

1971-1972