

## **Permit Attachment 10**

# **Umatilla Chemical Agent Disposal Facility**

## **UMCDF Training Plan**

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## **Attachment 10**

### **UMCDF Training Plan**

[40 CFR §264.16; ORS 466.105(6); OAR 340-100-0002, 340-104-0001]

#### **1.0 Introduction**

This training program was developed to meet the requirements of 40 CFR 264.16 and 40 CFR 270.14. The training program was designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems.

The training program covers personnel safety, release prevention, decontamination procedures, hazardous operations, emergency response and contingency plan implementation, inspection, and normal (including startup and shutdown) UMCDF operation and maintenance. Various training techniques are utilized, including classroom courses, simulations, training materials, and hands-on experience. A control room simulator is provided for control room operators to learn tasks and practice team building. The training program provides for both initial and continuing training for supervisors and personnel involved in handling hazardous waste or operating and maintaining hazardous waste management equipment.

This training program must be periodically updated to reflect changes in the UMCDF personnel training plan. The UMCDF personnel training plan is reviewed by the UMCDF training manager at least annually and updated, if necessary. Changes in regulations, waste types, UMCDF design or operation, waste management equipment or techniques, or administrative, Contingency Plan, and operating procedures may necessitate a change to the program.

#### **2.0 Outline of Training Program**

All personnel receive training pertinent to their job duties. Initial training includes emergency response actions and hazardous waste recognition. Personnel receive additional training relative to their specific job duties. Training may include classroom instruction, demonstrations of the operation of processes and equipment, and hands-on training on implementing UMCDF procedures involving hazardous waste. Training required by RCRA is completed within six months of beginning employment or a new assignment. In addition to formal training, key UMCDF staff and operation and maintenance personnel may participate in UMCDF performance testing and evaluations. Personnel directly involved in the management of hazardous waste are required to demonstrate proficiency in all duties relevant to their responsibilities. Table 10-1 is an outline of the introductory and continuing training program. Minimum introductory and continuing training course requirements and training requirements by job position are maintained in the UMCDF site training records and operating record.

Sections 2.0 through 11.0 address job titles/job descriptions; training content frequency and techniques; the UMCDF training manager; relevance of training to job position; training for emergency response; and training documents and records.

### **3.0 Job Title/Job Description**

[40 CFR 264.16(d)(1) and (2); OAR 340-104-0001]

Job descriptions, including title, office, duties, and minimum qualifications/training for each position related to hazardous waste management must be maintained at the UMCDF. The exact job descriptions and training requirements are subject to change to reflect changing conditions, requirements, and needs.

All personnel working in the UMCDF are required to have the training relevant to their positions in order to:

- Demonstrate the ability to understand and apply both oral and written instructions at a level appropriate to the assigned job
- Develop the aptitude and attitude necessary to ensure compliance with regulatory requirements.
- Be able to respond to contingency events in accordance with their duties and responsibilities.

### **4.0 Training Content, Frequency, and Techniques**

[40 CFR 264.16(a)(3), 264.16(c), 264.16(d)(3); OAR 340-104-0001]

The training program provides initial, refresher, and continuing training for operations, maintenance, laboratory, and other UMCDF personnel involved in the waste management unit operations.

The principal objectives of the training program are:

- Train UMCDF personnel to safely operate, maintain, and monitor the UMCDF.
- Train UMCDF personnel to respond effectively to emergencies by familiarizing them with emergency procedures, equipment, and systems.

The training program covers personnel safety (including Occupational Safety and Health Administration training in accordance with 29 CFR 1910.120), chemical agent release prevention, decontamination procedures, hazardous waste management operations, emergency response and Contingency Plan implementation, inspections, normal processing, and critical UMCDF operations and maintenance.

The training program consists of initial classroom training, hands-on training, and continuation training and refresher courses. The training program consists of initial classroom training, hands-on training, and continuing training and refresher courses. The training program is designed to prepare UMCDF employees to operate the UMCDF in a uniform and consistent manner that provides protection to human health and the environment, both on and off the UMCDF.

Personnel are required to complete both the initial and continuing training applicable to their job position. In addition to completing assigned operations and maintenance courses, certain employees must understand the basic operation of the UMCDF, as well as Army regulations applicable to chemical surety, security, and safety. Other training topics applicable to all employees are what to do if UMCDF or Umatilla Army Depot alarms sound, how to handle cases of chemical agent exposure, and how to render general first aid. All employees are provided training on the Employee Concerns Program. This program identifies employee responsibility to report safety and/or environmental concerns, mechanisms to report these concerns, and employee protections from reprisal by the company as required in condition ILS of this permit.

All new employees receive familiarization training, and applicable courses for hazardous waste management, environmental protection, and safety must be satisfactorily completed before workers are allowed to work unsupervised.

Examinations measure skill and/or knowledge and document proficiency or comprehension.

Each UMCDF operations and maintenance course consists of classroom and/or on-the-job training. The taken in classroom training and on-the-job training are described in the following paragraphs. A detailed description of each course is maintained at the UMCDF. Continuing training, refresher courses, and necessary requirements for their completion are described below.

### **5.0 Classroom Training**

During classroom training, the training staff uses training materials and instructional aids to train the personnel who operate the UMCDF. The type and length of training is dependent on the specific job assignment.

### **6.0 On-the-Job Training**

Once classroom training is completed, personnel work in the facility under direct supervision of process supervisors and/or individuals certified in the job duty. The personnel gain knowledge through practicing skills and must demonstrate competency and knowledge through practical demonstrations that certify them in their job positions.

Personnel may not perform job tasks unsupervised until they successfully complete the necessary certifications (performance demonstrations) for the task.

### **7.0 Continuing Training and Refresher Courses**

[40 CFR 264.16(c), OAR 340-104-0001]

Each person is given initial training when hired and/or assigned to the UMCDF workforce. Refresher training, including that concerning chemical agent characteristics, symptoms, first aid, and Contingency Plan procedures, is conducted within  $\pm 30$  days of anniversary dates and whenever the process changes. Operations and maintenance training is conducted whenever significant process changes are implemented. The training courses, including refresher courses, are tailored to the specific workload, as appropriate.

Additional training requirements for specific personnel are based on observation and critique by safety and supervisory personnel, and remedial training is conducted whenever necessary. The minimum recommended continuing training program for specified job positions is maintained in the UMCDF site training records and operating record.

**8.0 UMCDF Training Manager**  
[40 CFR 264.16(a)(2); OAR 340-104-0001]

The UMCDF training manager is responsible for the training program at the UMCDF. The UMCDF training manager must be knowledgeable in the operation of the UMCDF and hazardous waste management. The requirements and responsibilities of the UMCDF training manager are to:

- Ensure that UMCDF personnel are properly trained in the safe operation of the UMCDF in accordance with federal, state, and local environmental regulations and the UMCDF's RCRA permit
- Assist in the resolution of problems involving permits and licenses from regulatory agencies, where such problems affect personnel training
- Assist in review of operating and maintenance procedures
- Supervise the preparation of training aids and materials
- Provide initial training to new personnel, continuing training as necessary to inform UMCDF personnel of new procedures, and at least annual refresher training

The UMCDF training manager must be trained in hazardous waste management. If possible, a UMCDF training manager must be selected who already has such a background. Otherwise, the UMCDF training manager must become thoroughly familiar with hazardous waste management requirements and operations prior to exercising control over training in this area.

Instructors must be knowledgeable in the topics they will be teaching. Course materials are reviewed by UMCDF management to ensure compliance with chemical surety, safety, and environmental requirements. Bulk items handling, safety, surety, and security personnel from the U.S. government provide guidance during the development of training materials for these courses. The Systems Contractor, overseen by the Army, is responsible for developing training materials and other course materials, and for conducting initial, refresher, and continuing training of UMCDF personnel. Equipment vendors may also provide certain equipment-specific training. Technical training may also be conducted by competent third parties contracted to provide specialized training not available at UMCDF.

**9.0 Relevance of Training to Job Position**  
[40 CFR 264.16(a)(2); OAR 340-104-0001]

Individuals filling each UMCDF job position receive training relevant to the duties and responsibilities specified by that job position. The training requirements for each UMCDF job position is maintained in the training records and UMCDF operating record. All UMCDF personnel receive New Employee Orientation Training (NEOT), New Employee Safety Training (NEST), Site Environmental Compliance Training (SECT), Chemical Surety Program (Chem Surety), Cardiopulmonary Resuscitation/First Aid (CPR/FA), and Emergency Response Training-1 (ERP-1) as well as Consolidated Annual Refresher Training (CART 1/2). UMCDF personnel receive additional training appropriate for the job position. Further training applicable to individual job responsibilities may also be provided. Visitors and vendors to the UMCDF receive training on emergency response, basic site rules, and chemical surety. Visitors and vendors who require unescorted access to the chemical limited area receive the same initial training as employees performing the same tasks.

## **10.0 Training for Emergency Response**

[40 CFR 264.16(a)(3); OAR 340-104-0001]

Emergency response training is designed and structured to ensure that all UMCDF personnel must be trained to respond properly to emergency situations as outlined in the UMCDF Contingency Plan Attachment 9, and comply with applicable permit requirements and environmental regulations.

Emergency response personnel receive training that addresses nonroutine situations that could lead to an emergency involving hazardous wastes, if proper responses are not implemented, such as:

- Procedures for locating, using, inspecting, repairing, and replacing UMCDF emergency and monitoring equipment (addressed in ERP-1, and/or the Inspection Schedule, Attachment 3 of the Permit)
- Key parameters for automatic waste feed cut-off systems (addressed in the applicable operating procedures, plant systems training, and Control Room operator training classes)
- Communications or alarms (addressed in NEOT and ERP-1, and/or applicable operating procedures, and the UMCDF Contingency Plan)
- Response to fires, explosions, or other releases (addressed in NEOT, Chem Surety, and ERP-1, and/or applicable operating procedures, and the UMCDF Contingency Plan)
- Response to groundwater contamination incidents (addressed in SECT and ERP-1)
- Shutdown of operations and evacuation (addressed in NEOT and ERP-1 and/or the UMCDF Contingency Plan).

Additional topics covered during emergency response training include:

- The chemical characteristics of the wastes personnel will be assigned to manage (ignitability, corrosivity, reactivity, and toxicity characteristic) and presence of chemical agent (SECT)
- Knowledge of what to do in the event of a spill or leak (ERP-1)
- The types of protective equipment, including the DPE, gas masks, and other protective clothing to be worn (NEST and ERP-1)
- Knowledge of basic first aid and cardio pulmonary resuscitation (CPR/FA)
- First responder contact information in the event of an emergency (NEST and ERP-1)

## **11.0 Employee Whistleblower Protection Training**

[40 CFR 264.16(a)(3); OAR 340-104-0001; GASP III, Case No. 0009 09349]

The initial and annual refresher training requirements of the UMCDF training program must include instruction on the employee whistleblower protection as required by the July 26, 2004, Opinion and Order on Judicial Review, Case No. 0009 09349 (*GASP III*). The training must include, but is not limited to:

- The workers' obligation to report good-faith concerns regarding the safety of workers, the public, or the environment, and related noncompliance with permit requirements;

- The workers' obligation to convey such concerns to the Department if those concerns are not otherwise sufficiently resolved; and
- Assurance that no worker shall be disadvantaged in any way by communicating such concerns in good faith.

## **12.0 Training Documents and Records**

[40 CFR 264.16(d), 40 CFR 264.16(de); OAR 340-104-0001]

Records of the following must be maintained at the facility for current personnel, until closure and for former employees for at least 3 years from the date the employee last worked at the facility. Personnel training records may accompany personnel transferred within the same company.

- The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job;
- A written job description for each position listed in (i) above. This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but must include the requisite skill, education, or other qualifications, and duties of employees assigned to each position;
- A written description of the type and amount of both introductory and continuing training that must be given to each person filling a position listed in (i) above;
- Records that document that the training or job experience required in Table 10-3 has been given to, and completed by, facility personnel listed in (i) above.

**Table 10-1. Outline of Initial and Continuing Training Process**

**I. Validation of Training Materials Described in Appendix A**

**II. Initial Training**

A. Classroom Instructions

1. Instructive course work
2. Explanation of relevance of training to job position for all UMCDF personnel
3. Instruction in response to emergencies
4. Supervised practice operation on simulated demilitarization equipment, where applicable

B. On-the-Job-Training

1. Acquire skills and complete performance demonstrations
2. UMCDF operation

**III. Continuing Training**

A. Classroom Instructions

1. Continuing training and refresher courses
2. Safety meetings
3. Review of Contingency Plan
4. Review of recordkeeping (e.g., logbooks)
5. Review of maintenance procedures

B. On-the-job-training, to include regular performance of jobs and duties by all UMCDF personnel

C. Continual observation by supervision to verify job competency and performance demonstrations as needed