

ATTACHMENT 7

TRAINING PLAN

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7.1 **PERSONNEL TRAINING [R315-3-2.5(b)(12), R315-8-2.7]**

7.1.1 This training plan has been developed in accordance with R315-3-2.5(b)(12) and R315-8-2.7 as an integral part of the facility's Hazardous Waste Permit for hazardous waste treatment and storage. It has been implemented to ensure that the facility is operated in a manner that protects human health and the environment both on and off the facility.

7.1.2 The training program trains facility personnel to perform their duties by providing them relevant initial and annual review training. The program provides all personnel with training to respond effectively to emergencies and become familiar with emergency procedures, emergency equipment, emergency systems, and implementation of the Attachment 9, Contingency Plan. Instruction is provided on hazardous waste management procedures relevant to the employees' duties to ensure compliance with this permit.

7.1.3 New hires complete required training before working unsupervised in the plant. They complete initial training requirements within six months of the date of their employment, assignment to the facility, or assignment to a new position at the facility. In addition, they complete advanced training requirements, as applicable, for their respective job titles prior to working unsupervised in the plant.

7.1.4 This training plan provides for recording and documenting the training that meets hazardous waste requirements. The plan is reviewed and updated periodically to maintain compliance with permit and regulatory requirements and can be accessed through the TOCDF Training department.

7.1.5 Section 7.2 provides an outline of the training program, while Section 7.3 describes implementation.

7.2 **OUTLINE OF TRAINING PROGRAM [R315-3-2.5(b)(12), R315-8-2.7]**

7.2.1 **Job Titles and Duties**

7.2.1.1 Each job title has a written job description that lists the requisite skill, education, or other qualifications, and the duties for that position. The job description and employee name filling that position is maintained by EG&G.

7.2.2 **Training Content, Frequency, and Techniques**

7.2.2.1 Training that covers the subject matter required by an employee's job is located in the Training Records database (maintained by the Training department) by job title. The descriptions of these courses, and the training frequency and techniques, are in said database.

7.2.3 **Site Training**

7.2.3.1 During training, the employees that handle or manage hazardous waste (described in 7.1.2) gain plant knowledge and experience based on classroom coursework and on-the-job training. Department managers or supervisors may conduct job-specific training or allow performance demonstrations for employees to demonstrate job competency or

complete experience requirements.

7.2.4 Annual Review and Other Training

7.2.4.1 The training courses that require continuing (i.e., refresher) training are noted in the Training database. Remedial training is conducted whenever necessary.

7.2.4.2 When the nature of waste handling work activities changes to mirror the changing status of the facility, personnel shall receive specific training before beginning any new tasks.

7.2.4.3 In addition to completing required courses, all employees must understand the basic operation of the facility and know and abide by Army regulations applicable to chemical agent facilities, such as security and safety.

7.2.5 Training Manager

7.2.5.1 The Training Manager is required to become thoroughly familiar with hazardous waste management requirements and facility operations prior to exercising control over this training program.

The Training Manager is responsible for ensuring that employees have completed the training requirements and performance demonstrations, if any, for their specified job.

7.2.6 Training for Emergency Response

7.2.6.1 Facility personnel are trained to respond properly, as outlined in Attachment 9 (Contingency Plan), to emergency situations based on their job responsibilities.

7.2.6.2 Site hazardous material response training is provided to selected on-site individuals who act as responders to hazardous material incidents. The site-specific training is provided by an instructor whose qualifications meet the regulatory requirements as determined by the Training Manager.

7.3 **IMPLEMENTATION OF TRAINING PROGRAM [R315-3-2.5(b)(12), R315-8-2.7]**

7.3.1 Training operations began prior to systemization, will continue through plant operations, and end when there is no longer any hazardous waste to manage. The training program includes initial, advanced, and annual review training.

7.3.2 Employees are assigned to training courses that meet the needs of the facility and ensure compliance with regulatory requirements. The Training department tracks the training given to, and completed by, each employee in the Training database.

7.3.3 The following information and documents shall be maintained and available at the TOCDF:

7.3.3.1 Job title for each position at the facility related to hazardous waste management, and the name of the employee(s) filling each job.

- 7.3.3.2 A written job description for each job title.
- 7.3.3.3 A written description of the type and amount of initial, advanced, and annual review training given to each person named.
- 7.3.3.4 The records that document the successful completion of the training and any experience required for each person named.
- 7.3.4 The training records and documents shall be kept at least until closure of the facility. Training records on former employees shall be kept at least three years from the date the employee last worked at the facility.