

WP 02-RC.04
Revision 6

RCRA Training Documentation

Cognizant Section: Site Environmental Compliance

Approved by: Stewart Jones



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1.0 INTRODUCTION ¹

The purpose of this plan is to define the process for evaluating, tracking, and maintaining the Resource Conservation and Recovery Act (RCRA) training requirements contained in Title 40 *Code of Federal Regulations* (CFR) Part 262, "Standards Applicable to Generators of Hazardous Wastes"; Part 264, "Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities"; and Part 270, "EPA Administered Permit Programs: The Hazardous Waste Permit Program." This plan is required pursuant to the Hazardous Waste Facility Permit (HWFP), Attachment P, and implements Attachment H training requirements. In concert with the RCRA, the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Management Training Program, described in Attachment H, Section H-1b, of the HWFP, is designed to ensure that hazardous waste management employees at the facility receive initial and continuing training relevant to their positions.

Employees at WIPP who are involved in hazardous waste management activities receive the same core training. A list of hazardous waste management job titles and position descriptions are identified in the HWFP, Attachment H1, RCRA Hazardous Waste Management Job Titles and Descriptions. Employees at WIPP must successfully complete training consisting of regulatory and procedurally based classroom instruction and applicable on-the-job training to perform hazardous waste management jobs.

The HWFP specifies that, within 30 days of employment, employees working at WIPP must successfully complete the General Employee Training (GET) class. GET provides instruction on radiation safety; emergency preparedness; spill response; safety, security, and hazard communications; and an overview of the RCRA. GET also includes an overview of policies and procedures and first responder awareness training in which each employee is instructed in how to initiate an emergency response sequence by notifying the Central Monitoring Room.

2.0 SCOPE

This plan applies to the training requirements of both generators of hazardous waste and support job functions described in Attachment H of the HWFP. This plan addresses the RCRA hazardous waste management training documentation process, including (1) the responsibilities of Human Resources, cognizant managers, Technical Training, Site Environmental Compliance (SEC), and employees relative to training; and (2) the tools and methods used to identify training requirements.

3.0 IMPLEMENTING RCRA TRAINING REQUIREMENTS

Training requirements contained in 40 CFR §264.16(b), "Personnel Training," state that facility personnel must successfully complete Treatment, Storage, and Disposal Facility training within six months of their employment or assignment to a facility or to a new position at a facility, whichever is later. The CFR further states that employees hired after the effective date of these regulations must not work in an unsupervised position

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until they have completed the training requirements. However, some job qualifications within Emergency Management, Facility Operations, Hazardous Waste Management, Hoisting Operations, Maintenance Operations, Radiological Control, and Waste Handling Operations require more than six months to complete.

Technical Training manages a RCRA Position Training Matrix (e.g., Attachment 3) to ensure that employees assigned to hazardous waste positions that require more than six months of training will be tracked initially on the RCRA Position Training Matrix under the title of Hazardous Waste Worker (HWW). These trainees will complete GET and Hazardous Waste Worker (HWW 101) within six months of employment or transfer into the applicable positions.

After they have completed GET and HWW 101, employees work unsupervised only on those tasks for which they have completed the applicable qualifications. Employees follow the WIPP guidelines for on-the-job qualifications using applicable qualification cards or job performance measures and work under direct supervision until qualified in a particular task. Individuals who have completed all qualifications will be placed on the RCRA Position Training Matrix in the position for which they have qualified.

A Job Change Analysis (JCA) is a process performed by line managers when a new job is created, when work requirements are added or removed from a job, or when employees assume a different job. The JCA is used to ensure that employees receive the correct level of training for the assigned job duties. The JCA form (Attachment 2) is issued by Human Resources and completed by line managers. The JCA form is routed to Technical Training where a training code, also known as a RCRA code, is assigned. The training code relates to required courses identified in the Technical Training database and is used to ensure the correct level of hazardous waste management training.

4.0 RESPONSIBILITIES

4.1 Site Environmental Compliance

SEC is responsible for maintaining an up-to-date list of employees holding job positions identified in Attachment H1b, of the HWFP pursuant to 20.4.1.500 New Mexico Administrative Code (NMAC), "Adoption of 40 CFR Part 264" (incorporating 40 CFR §264.16). SEC ensures that this requirement is met through monthly receipt of a printout of trained personnel from Technical Training and assessing the printout for continuity of hazardous waste management training.

SEC assists line managers, as requested, in the JCA process to ensure that hazardous waste management positions are identified in accordance with Attachment H1 of the HWFP.

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4.2 Human Resources

Human Resources ensures that required RCRA-related training is conducted by qualified instructors within Technical Training, job performance measure evaluators, and subject matter experts. Human Resources notifies the cognizant manager and training staff when any employee is transferred into or out of a position associated with hazardous waste management.

Human Resources is responsible for processing JCA forms received from managers and forwarding the JCA forms to Technical Training, Health Services, and Emergency Management for appropriate actions.

4.3 Line Managers

Line managers are responsible for completing JCA forms to document personnel changes, such as new hires; changes in work scope; and temporary or permanent separations from WIPP. Line managers are also responsible for reviewing job functions and making job description changes. Job description and job functions should be reviewed at least once every calendar year.

Line managers also are responsible for ensuring that an employee whose training and/or qualifications have lapsed either is working under the direct supervision of a person who is RCRA hazardous waste management trained, or is immediately removed from the RCRA hazardous waste management job function until the appropriate training or qualification is completed. The individual may work under the direct supervision of a qualified person for up to 30 days after lapse while they complete their refresher or requalification training. For the purposes of this plan, "working under direct supervision" means that a qualified individual or operator has the ability to physically or verbally take control of a task or process to prevent a hazardous or abnormal condition. An individual who lapses in refresher or requalification training by more than 30 days will not be allowed to perform work activities associated with their job position until all required training has been completed successfully.

4.4 Department and Section Managers

Department and section managers are responsible for reviewing job functions and the training reports, issued at 90, 60, and 30 days, and the delinquent training notifications, to ensure that their employees are trained and remain qualified.

4.5 Technical Training

Technical training documentation is maintained by Technical Training at the WIPP facility. A database that records training qualifications and course attendance is maintained. The database is used to identify course refresher and requalification dates. Training records on current employees are kept by Technical Training. The documents that define the process by which these training activities are managed and maintained by Technical Training are part of the RCRA Operating Record.

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Technical Training is responsible for maintaining and updating the RCRA Position Training Matrix database. Revisions to the RCRA Position Training Matrix database are made based on job change notifications obtained from affected managers, and updated training records. Technical Training is also responsible for producing periodic training database reports, and forwarding RCRA Position Training Matrix reports to SEC monthly.

4.6 Hazardous Waste Personnel

HWW personnel are responsible for keeping their training and qualifications current, maintaining an awareness of their training requirements, and attending refresher training as necessary.

5.0 JOB DESCRIPTIONS

Washington TRU Solutions LLC maintains job descriptions for each hazardous waste management position. Each job description contains duties, and requisite skills, experience, education, and training requirements. The position titles and job descriptions addressing RCRA generator and Treatment, Storage, and Disposal Facility (TSDF) activities are included in Attachment H1 of the HWFP.

Attachment 1, RCRA Hazardous Waste Management Job Titles, is the list of the RCRA hazardous waste management job positions identified in the HWFP. The RCRA Position Training Matrix itemizes each position by the applicable RCRA regulatory requirement and also identifies which positions are emergency response job functions.

Identifying employees who require hazardous waste management training and tracking RCRA training requires the diligence of the line managers because this process can be complex. For example, Underground Operations has a number of employees who have RCRA hazardous waste management job functions. To meet the RCRA training requirements, these positions require GET and HWW 101, and thus do not involve a significant number of RCRA courses. However, a significant number of Underground Operations personnel are also involved with the WIPP Mine Rescue Team, the First-Line Initial Response Team (FLIRT), and the Emergency Response Team (ERT). The manager of Emergency Management is responsible for tracking and scheduling the training of the Mine Rescue, FLIRT, and ERT personnel. Each of these positions requires additional training.

Thus, line managers must be aware of the job functions of the personnel within their respective organizations to ensure that they coordinate with the manager who is responsible for scheduling and tracking RCRA hazardous waste management training for personnel who work in one organization but are required to complete RCRA hazardous waste management training for a job function in a different organization. This involves an extra effort on the part of both affected managers to schedule work, evaluate job functions, and schedule and track required RCRA HWW training.

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6.0 JOB CHANGE ANALYSIS FORM

The JCA form is initiated and completed by the line manager when an employee is a new hire, has a change in work scope, or is temporarily or permanently separating from WIPP. The JCA form is used to assess or reassess the need for RCRA HWW training and/or medical surveillance. A copy of the JCA form and associated instructions are provided as Attachment 2, Job Change Analysis.

7.0 RCRA TRAINING AND TRACKING

The RCRA Position Training Matrix is used to track RCRA training. Technical Training maintains a training database that contains each worker's position title, position start date (the date of qualification completion and/or the date the employee was assigned to that position), training requirements, training status, and training and qualification refresher dates as required by 40 CFR Part 264, or as defined in the HWFP.

The RCRA Position Training Matrix includes RCRA hazardous waste management job titles and the names of employees holding those jobs. Technical Training updates the RCRA Position Training Matrix when a JCA form is received from Human Resources and determines if a worker is added to or eliminated from the matrix. The revised matrix and the JCA form(s) that initiated the revision are placed in the Technical Training permanent RCRA records files.

8.0 TRAINING

8.1 Training Notification

Technical Training notifies the employee of required training 90, 60, and 30 days prior to the required training date. Managers are notified 60 and 30 days prior to the expiration date of required training for employees under their supervision.

8.2 Lapses in Training

An employee's training lapses if that employee fails to take, and pass, the required training during the month of specified refresher/requalification training. The employee may work under the direct supervision of another qualified employee for up to 30 days after lapse while they complete their refresher/requalification training. If an employee's refresher/requalification training lapses more than 30 days, that employee will not be allowed to perform work activities associated with his or her job position and the manager must ensure that the affected worker does not perform those job duties. The worker may not perform RCRA hazardous waste management job duties until all identified training requirements are met. Additional information concerning training lapses can be found in WP 14-TR.01, WIPP Training Program.

Attachment 4, RCRA Training Documentation Process, is a logic diagram that shows the flow of documentation associated with RCRA hazardous waste management training.

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9.0 RECORDS

RCRA Position Training Matrix Reports (List of Personnel assigned to RCRA Positions)

Job Change Analysis Form

10.0 REFERENCES

Title 40 CFR Part 262, "Standards Applicable to Generators of Hazardous Wastes"

Title 40 CFR Part 264, "Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities"

Title 40 CFR §264.16(b), "Personnel Training"

Title 40 CFR Part 270, "EPA Administered Permit Programs: The Hazardous Waste Permit Program"

20.4.1.500 New Mexico Administrative Code, "Adoption of 40 CFR Part 264"

New Mexico Environment Department, Hazardous Waste Facility Permit Issued to the Waste Isolation Pilot Plant, Permit NM 489019088-TSDF

WP 14-TR.01, WIPP Training Program

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Attachment 1 - RCRA Hazardous Waste Management Job Titles

Position Title	H1	262	264/270	Emergency Responder
TRU Waste Handlers	X		X	
Site-Generated Waste Handlers	X			
Transportation Engineers	X		X	
WWIS Data Administrator	X		X	
First Team Members (Plant Helpers)	X	X	X	
First Team - Team Leader	X	X	X	
Manager, Waste Handling	X	X	X	
Facility Shift Engineer	X		X	X
Facility Shift Manager	X		X	X
Central Monitoring Room Operator	X		X	X
Waste Hoist Operator	X	X	X	
Waste Hoist Shaft Tender	X	X	X	
Waste Hoisting Manager	X	X	X	
Radiological Control Technician	X		X	
Manager, Radiological Control	X		X	
Emergency Services Technician	X			X
Fire Protection Technician	X			X
Sampling Team Member (and Assistant)	X	X	X	
Manager, Environmental Compliance	X	X	X	
Chief Office Warden				X Volunteer (V)
Emergency Response Team Member				X (V)
Mine Rescue Team Member				X (V)
Assistant Chief Office Warden				X (V)
First Line Initial Response Team Member				X (V)
Technical Trainer	X		X	
Manager, Technical Training	X		X	
Quality Assurance Technician	X		X	
Team Leader, Quality Assurance/Inspection Services	X		X	
Fire Brigade	X			X(V)
Underground Hazardous Waste Worker	X	X	X	
Hazardous Waste Worker	X	X	X	X
Manager, Shipping Coordination	X		X	

Note: H1 refers to Attachment H1 of the HWFP

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Attachment 2 - Job Change Analysis

Job Change Analysis

When a Waste Isolation Pilot Plant (WIPP) employee is hired or separated, or transferred from one section or department to another, or when an employee's job duties change significantly, the employee's new manager shall complete a Job Change Analysis (JCA) and reassess requirements for necessary qualifications, medical surveillance, and/or Resource Conservation and Recovery Act (RCRA) training. All parts of this form must be completed and returned to Human Resources, MS-451-22 or FAX 885-1761, no later than the effective date of the change.

Check one of the following:

- Change in Scope of Work Change in Position New Hire Separation from WIPP
- Temporary Separation Payroll and Accounting
- Other: _____

Employee Name: _____ Effective Date: _____

New: Department/Section: _____ HR Position/Title: _____

Manager/Mail Stop: _____

Previous: Department/Section: _____ HR Position/Title: _____

Manager/Mail Stop: _____

A. Medical Surveillance Programs Analysis:

PROGRAM

- Respirator Qualification U.S. Department of Transportation (DOT) Driver
- Occupational Hearing Program None

B. RCRA Analysis

1. Will this position involve hazardous waste management activities? Yes No *

**IF YOU ANSWERED "NO" TO QUESTION #1, SKIP #2 AND SIGN DOCUMENT*

2. RCRA Position Title _____

If the above position is "Facility Shift Manager" or "Facility Shift Engineer" as defined in the Hazardous Waste Facility Permit (HWFP), immediately notify Site Environmental Compliance and Requirements Management by telephone. This must be completed no later than the last day the employee functions in these positions.

Cognizant Manager's Signature/Date _____ / _____

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Attachment 2 - Job Change Analysis (Form Instructions)

1. Check one of the following:

- Change in Scope of Work: The employee is performing additional, revised or modified duties.
- Change of Position: The individual is working in a new position.
- New Hire: New individual employed at WIPP.
- Separating: The individual is on medical or disability leave of absence or is no longer employed at WIPP.
- Payroll and Accounting: Change in HR job title by promotion, demotion or other action.
- Other: If the change is other than what is listed above, then check other and put description of change.

2. Employee Name: Full name.

3. Effective Date: The date when the change will occur.

4. New Department/Section: The new department and section in which the employee will be employed (if applicable).

5. New HR Position/Title: The employee's new Human Resource Position/Title.

6. New Manager/Mail Stop: The employee's new manager's name and mail stop (if applicable).

7. Previous Department/Section: The employee's previous department and section.

8. Previous HR Position/Title: The employee's previous Human Resource Position/Title.

9. Manager/Mail Stop: The employee's previous manager's name and mail stop.

A. Medical Surveillance Programs Analysis:

- Program: Respirator Qualification: The employee requires a respirator.
- Occupational Hearing Program: The employee will be working in an area where noise routinely exceeds 85 dB.
- DOT Driver: The employee is required to meet DOT requirements for drivers.
- None: None of the above applies for Part A.

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B. RCRA Analysis

1. Will this position involve hazardous waste management activities? The employee's duties involve hazardous waste management duties--answer "yes" or "no." If the answer is "no," the cognizant manager signs and dates at the end of the form. If the answer is "yes," the manager will complete item 2 prior to entering signature and date. If unsure, discuss with Site Environmental Compliance manager or designee.

2. RCRA Position/Title: The employee's RCRA hazardous waste management job title as listed in the Appendix H1 of the HWFP. A list of RCRA Emergency Coordinators and their telephone numbers is contained in the HWFP, Attachment F, RCRA Contingency Plan, Table F-2. Therefore, if any changes, deletions, or additions are made to the list, a Class 1 permit modification must be received by the New Mexico Environment Department (NMED) within seven days. Timely notification to Requirements Management and Site Environmental Compliance is required. RCRA Analysis, Item 2, for the JCA, will assure that a permit modification is submitted to the NMED.

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Attachment 3 - Sample RCRA Position Training Matrix Report

RCRA MATRIX - EMERGENCY SERVICES TECHNICIANS

This report contains information that must be controlled in accordance with the Privacy Act of 1974. Unauthorized use or distribution is prohibited.

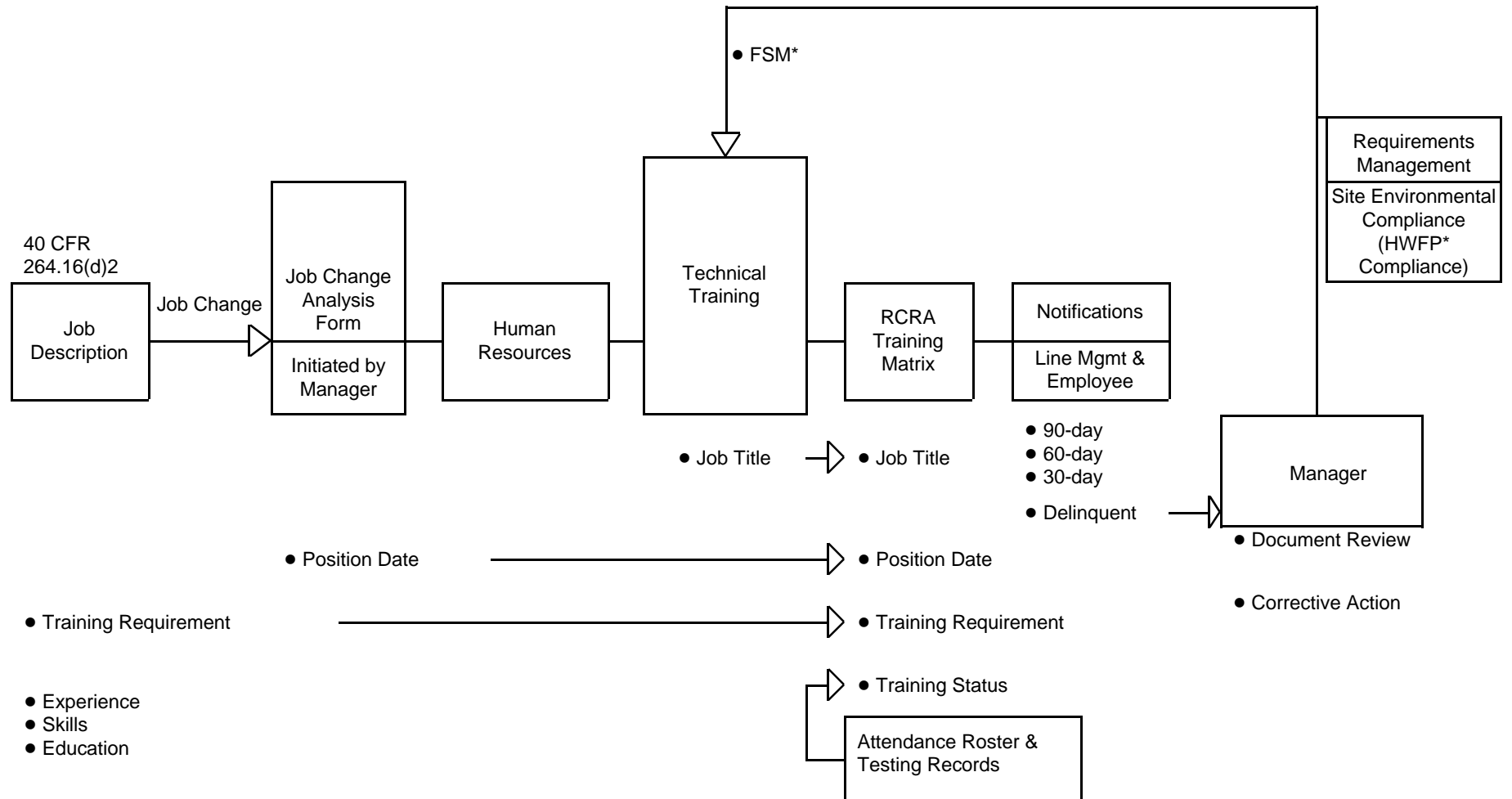
ALL DATES ARE DUE DATES FOR COURSES REQUIRING ANNUAL REFRESHER. THE ABSENCE OF A REFRESHER DATE INDICATES THAT THE COURSE HAS NOT BEEN TAKEN.

NAME	POSITION DATE	ERT107 (annual)	GET19X GET19XA (annual)	HWW101 HWW102 (annual)	HWR101 HWR101 (annual)	RAD201 RAD202 (annual)	TRG293 TRG298 (biennial)
XXXX, XXXXX	05/96		02/99	01/99	08/98	07/98	11/98
YYYYY, YYYY	05/96	11/98	03/99	01/99	08/98	06/98	11/98
ZZZZZZ, ZZZZZ	05/96	12/98	06/98	01/99	08/98	07/98	11/98
XYZXY, WZXYZ	05/96			01/99	08/98	02/99	11/98

PRIVATE INFORMATION

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Attachment 4 - RCRA Training Documentation Process



* FSM - Facility Shift Manager
HWFP - Hazardous Waste Facility Permit