

## **VOLUME 1 CHAPTER 7**

### **7.0 TRAINING**

#### **7.1 TRAINING PROGRAM**

##### **7.1.1 Purpose**

The purpose of this training plan is to meet the requirements of 40 CFR §264.16 for training of personnel of a hazardous waste management facility. The purpose is further to meet the objectives of PacifiCorp management to supply all of the necessary training to personnel to operate and maintain the facility in compliance with all environmental regulations, with safety standards, and in the most efficient and effective manner possible to perform the required duties.

Following implementation of the system automations, there will be three primary roles for personnel involved with the Idaho Falls Pole Yard system operations. These roles are:

- HWMF Manager,
- Emergency Coordinator, and
- On-site Environmental Technician

A description of the roles and responsibility for each position are described in Volume I Chapter 5 of this permit reapplication. The training requirements for each role are described below.

##### **7.1.2 Scope**

In accordance with RCRA regulations 40 CFR 264.16 and 29 CFR 1910.120 the following paragraphs describe the required training for the Idaho Falls Pole yard personnel:

- PacifiCorp and/or consulting engineers will provide training in operation and maintenance of the facility.
- PacifiCorp will provide job descriptions, including educational and experience/training requirements in accordance with federal regulations 40 CFR 264.16.

### **7.1.3 Environmental Regulation Training**

#### **7.1.3.1. Introduction**

PacifiCorp shall only assign personnel with extensive regulatory management experience to the role of HWMF Manager. This person shall either already have the proper experience or be provided specific training relating to the Clean Air Act, Clean Water Act, TSCA, RCRA, CERCLA and SARA prior to serving in as the HWMF Manager.

#### **7.1.3.2. Manifesting and Transportation**

The HWMF Manager will either already have the proper knowledge or be provided the proper classroom training to appropriately characterize, manifest, and arrange for transport of spent carbon materials. Since carbon has been replaced only every four or five years over the past decade, yearly training is judged to be unnecessary.

#### **7.1.3.3. Contingency and Spill Prevention and Response Plan**

The HWMF Manager/Emergency Coordinator and the on-site Environmental Technician are required to attend an initial 40-hour OSHA approved Hazwoper training course that includes for awareness level emergency response training as defined in 29 CFR 1910.120. The Emergency Coordinator shall also attend a Hazwoper Supervisor training course that includes instruction on first responder operations level emergency response. Both of these employees shall receive an 8-hour of annual Hazwoper refresher training in compliance with 40 CFR 1910.120. The on-site Environmental technician shall receive instruction on the use of a half face respirator during the 8-hour refresher and have a

respirator fit test each year. Annual medical monitoring of the on-site Environmental Technician will also be required as specified in the Site Specific Health and Safety Plan.

Each year the HWMF Manager and the on-site Environmental Technician shall review and if necessary update the Contingency and or SPR Plans. If changes to the plans are required, the entities listed in Table 5.3 will be provided copy of the modified plans and then send a confirmation letter to the HWMF Manger acknowledging receipt of the modifications.

#### **7.1.3.4. Certification of Training**

Sign-off sheets for each of the three major types of personnel at the HWMF are provided as Forms 7.1A, 7.1B, and 7.1.C in Volume I Appendix C of this permit reapplication. These training forms will be filled in and then kept on file at the facility for at least three years after termination or reassignment of personnel.

#### **7.1.4 Safety Training**

##### **7.1.4.1. 40-Hour Hazardous Waste Operations and Emergency Response**

Prior to the start of service at the site, the HWMF Manager and on-site Environmental Technician will complete the 40 hour Hazardous Waste Operations and Emergency Response training as presented in federal regulations 29 CFR 1910.120. The HWMF Manager and on-site Environmental Technician will be required to keep this training current by attending yearly 8 hour refresher courses through qualified organizations.

##### **7.1.4.2. Fire Safety Training**

The on-site Environmental Technician will be trained on the use of the existing wall mounted fire extinguisher systems at the site. This training will involve discussions with the fire extinguisher equipment manufacturer and then actual practice with the equipment at the site. The on-site Environmental Technician will then annually provide instruction to other personnel on-site. The annual training will emphasize the extinguisher

capabilities and limitations, extinguisher operation and application techniques, and the importance of maintenance. Actual "hands-on" exercise will be available during the training.

Following implementation of the system automations in calendar year 2009, the HWMF Manager and on-site Environmental Technician will also be trained on the new electronic smoke detector system and the sequence of electronic notification.

#### **7.1.4.3. First Aid**

Since only one on-site Environmental Technician is expected to be on-site at a given time and because the site is located within the city of Idaho Falls, medical emergencies shall be addressed by calling 911.

#### **7.1.4.4. Respirators**

A respirator protection program will be administered in accordance to 29 CFR § 1910.134 when it is evident that respiratory protection is necessary to prevent employee exposure to harmful airborne contaminants. Based on knowledge of potentially harmful contaminants at this facility, respiratory protection when required will consist of half mask dual cartridge organic vapor respirators. The HWMF Manager and on-site Environmental Technician will receive initial training to consist of use, maintenance, limitations, and fitting of individual respirators. Medical surveillance of site personnel is required prior to donning a respirator. In addition, he or she will be required to perform positive and negative pressure checks each time a respirator is donned.

#### **7.1.4.5. CPR**

Since only one on-site Environmental Technician is expected to be on-site at a given time and because the site is located within the city of Idaho Falls, medical emergencies shall be addressed by calling 911.

#### **7.1.4.6. Initial Right-to-know Training**

Initial Right-to-know training has been conducted for all employees of PacifiCorp. New employees will receive similar training prior to starting work. Training will consist of showing a chemical safety video, review of MSDS and chemical literature, personal protective equipment, methods of determining exposure, and steps to take in the event of an emergency.

#### **7.1.4.7. Material Safety Data Sheets**

A chemical inventory for known hazardous chemicals has been completed with MSDS and chemical literature assembled where MSDS were not available. This information is kept and maintained in a binder which is available for employee review.

#### **7.1.4.8. General Safety Meetings**

General safety meeting will only be performed in the event that more than one person, including the HWMF Manager, is onsite at the same time. Meetings will be recorded and kept onsite in the HWMF office.

#### **7.1.4.9. Communications and Alarms**

Prior to working at the site, the HWMF Manager and on-site Environmental Technician shall review the Contingency Plan and O&M Manual (see Volume I Chapters 5 and 10 of this permit reapplication). After completion of the system automations, a contractor will be on-site to startup the treatment system and to provide training on the new electronic alarm and communication systems.

#### **7.1.5 Training in System Operations and Maintenance**

Training requirements relating to operations and maintenance of the treatment plant are presented in Volume I Chapter 10 Section 10.1.9.

### **7.1.6 Post-closure Training**

All elements of this training plan will be continued throughout the life of the corrective action program and post-closure activities.

## **7.2 TRAINING RECORDS**

Training records will be available for inspection by appropriate authorities during normal business hours. The HWMF personnel training records will be filed in the office at the site or in other PacifiCorp offices until the closure of the project. This file will contain the following:

- Training Sign-off Sheets.
- A list of continuing education courses completed with the accompanying certificate of completion or diploma.
- Records of completion for all courses and refresher courses pertinent to the operations at the HWMF.





