

**HWMA/RCRA PART B PERMIT**  
**FOR THE**  
**IDAHO NATIONAL LABORATORY**

**BOOK 1 OF 1**

**PER-140 – MATERIALS AND FUELS COMPLEX**  
**SODIUM PROCESS FACILITY AND**  
**SECONDARY SODIUM SYSTEM**

**ATTACHMENT 5**

**SECTION H – TRAINING**

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## H. PERSONNEL TRAINING

This section outlines and describes the training program for personnel involved in the management of hazardous and mixed waste at treatment, storage, and disposal (TSD) units at the MFC Sodium Process Facility (SPF) and Secondary Sodium System (SSS) Piping/Components Hazardous Waste Management Act/Resource Conservation and Recovery Act (HWMA/RCRA) units addressed in this permit (PER-140).

A training program has been implemented to ensure that personnel involved in the management of hazardous and mixed waste at the MFC TSD units addressed in this permit receive training consistent with the requirements of the Idaho Administrative Procedures Act (IDAPA) 58.01.05.008 and 58.01.05.012 [Title 40 Code of Federal Regulations (CFR) Part 264.16 and 270.14]. The training program is designed to ensure that personnel are trained to hazardous waste management procedures including, but not limited to, inspections, normal operations, emergency procedures, equipment, systems, and contingency plan implementation. Duties performed at the TSD units will be performed in a safe, disciplined, and professional manner.

### H-1. Outline of Training Program [IDAPA 58.01.05.008; 40 CFR 264.16(a)(1)]

Training programs are developed using a systematic approach to training (SAT). The SAT process involves:

- Analyzing tasks to determine the training requirements
- Designing a plan to satisfy the training requirements
- Developing plans and all supporting training materials
- Implementing the training plans
- Evaluating the effectiveness of the training and making recommendations for changes.

The SAT process is used to determine the training requirement for each task listed in Table H-1. The training program for TSD unit personnel involves a combination of formal [classroom, group

1 instruction, on-the-job training (OJT), etc.] and informal training sessions (one-on-one instruction,  
2 required reading, etc.). The training requirements for each position are identified in Table H-1. Lesson  
3 plans and OJT guides are developed to support tasks identified in Table H-1.  
4

5 Programs prepared by the TSD training organization provide the requirements to be completed by  
6 the individual during training. As the program is satisfactorily completed, it is verified and documented  
7 in their training records.  
8

9 The training program is upgraded as needed in response to changes in job descriptions, job  
10 reassignment, process or procedural changes, technological changes, or implementation of new regulatory  
11 requirements that affect TSD unit operations. Revisions to the training program are approved by the  
12 training manager and the TSD unit manager (training director) for the specific TSD unit and the job  
13 analysis data is updated to reflect the changes in the training requirements.  
14

15 TSD unit management works with subject matter experts to identify personnel training  
16 requirements. The TSD unit training organization (1) schedules and/or provides the training, (2) revises  
17 and updates training material as needed, and (3) maintains training documentation. The TSD unit training  
18 organization maintains individual training records for TSD unit employees.  
19

20 **H-1a. Job Tasks [IDAPA 58.01.05.008; 40 CFR 264.16(d)(1), 264.16(d)(2)]**  
21

22 The job tasks for personnel involved with hazardous waste management at TSD units are  
23 included in Table H-1 “Minimum Training Matrix for TSD unit Personnel” Personnel are trained to those  
24 sections of the permit, which are pertinent to their specific job assignments.  
25

26 Security Guards – The Security personnel are not stationed at the permitted units nor are they  
27 involved in the management or handling of the waste. Security personnel receive training from the  
28 security organization relative to their positions and the facilities they serve. Therefore, training of  
29 security personnel is not discussed further in this section.  
30

31 On Scene Commander – is the Idaho National Laboratory (INL) Fire Department Chief. The INL  
32 Firefighters serve the INL Site in fighting fires and containing major spills, including spills of waste from  
33 waste management units. The INL Fire Department conducts a self-contained training program for their  
34 personnel, which includes procedures for handling fires and spill emergencies involving hazardous

1 materials and hazardous mixed waste at the INL Site. Therefore, training of fire fighters is not discussed  
2 further in this section.

3  
4 Emergency Director (ED) – is trained on the INL (Site-wide) and Idaho Completion Project (ICP)  
5 Emergency Plan (EP)/Resource Conservation and Recovery Act (RCRA) Contingency Plan (CP) or  
6 Industrial Safety and Hygiene Program as part of his/her duties. The ED will be informed by the  
7 Emergency Action Manager (EAM) or facility personnel at the MFC. Therefore, training of ED is not  
8 discussed further in this section.

9  
10 **H-1b. Training Content, Frequency, and Techniques [IDAPA 58.01.05.008;**  
11 **40 CFR 264.16]**

12  
13 The TSD unit training program consists of a combination of classroom instruction and OJT.  
14 Additionally, TSD unit employees receive new employee orientation and training. [All employees  
15 working at or assigned as part-time/frequent visitor to Site facilities are required to complete annual  
16 facility access training and general employee radiation training (GERT) unless they are currently trained  
17 as radiation workers.]

18  
19 The initial training includes a general orientation of INL and TSD unit procedures including  
20 evacuation and alert procedures, training requirements, and emergency equipment locations. The initial  
21 training provides TSD unit personnel with training commensurate with their job assignments in the  
22 following areas:

- 23  
24 • General description of the MFC  
25  
26 • Job-related procedures, policies, and instructions  
27  
28 • Radiological health and safety program  
29  
30 • Fire protection program  
31  
32 • Hazards associated with the TSD unit.

33 RCRA training is conducted annually for TSD unit employees to address changes that have

1 occurred which include such topics as permit status, permit requirements, contingency and inspection  
2 plan implementation, and hazardous waste management procedures for the TSD unit(s) to which they are  
3 assigned.

4  
5 The following major knowledge areas are included and evaluated based on job position and  
6 formal criteria identified in the job analysis:

- 7
- 8 • RCRA requirements as they relate to unit operations
  - 9
  - 10 • Hazardous materials
  - 11
  - 12 • TSD unit systems and components (including waste treatment processes and operations)
  - 13
  - 14 • Normal operating procedures and shutdown procedures
  - 15
  - 16 • Emergency or off-normal operating procedures
  - 17
  - 18 • Inspections and equipment maintenance
  - 19
  - 20 • Occupational Safety and Health Administration (OSHA) and related health and safety  
21 requirements
  - 22
  - 23 • TSD unit and operational/administrative procedures.
  - 24

25 TSD unit work and maintenance is performed by appropriate personnel whose qualifications have  
26 been verified before beginning work.

27  
28 Employees may be given written and/or oral examinations, operational evaluations, and reviews  
29 to ensure that they are adequately trained relative to their job tasks. Results of examinations, written or  
30 oral evaluations, and reviews are documented. All completed qualification standards, checklists,  
31 examinations, written evaluations, and documented oral evaluations are maintained in each individual's  
32 training record.

33 Table H-1 shows the task training requirements for TSD unit personnel involved in

1 hazardous/mixed waste operations at TSD units addressed in this permit. TSD unit personnel may receive  
2 additional training beyond that shown in Table H-1. This training is documented and included in  
3 employee training records.

4  
5 Occasionally, TSD unit personnel attend training classes conducted external to the INL or  
6 conducted at the INL Site by non-INL subcontract personnel. In order to verify an employee's attendance  
7 at these training courses, a copy of the class certification or other documentation is maintained in the  
8 individual's training record.

9  
10 **H-1c. Training Director [IDAPA 58.01.05.008; 40 CFR 264.16(a)(2)]**

11  
12 For all TSD units addressed in this permit, the facility manager (training director) functions in  
13 conjunction with his/her designee(s) to insure that all segments and responsibilities associated with the  
14 training program are accomplished. The training director provides overall leadership and management  
15 direction to the TSD unit training organization. The director's duties include the following:

- 16  
17 • Provide direction to the TSD unit training organization  
18  
19 • Ensure that performance of training personnel is evaluated  
20  
21 • Approve TSD unit training program  
22  
23 • Ensure that all program objectives and requirements are satisfied and that the training  
24 program meets the requirements of IDAPA 58.01.05.008 (40 CFR 264.16) and 29 CFR  
25 1910.120.

26  
27 The training director or his/her designee(s) is responsible for ensuring that TSD unit personnel  
28 are trained in waste management and contingency plan implementation, including emergency procedures,  
29 and for ensuring that TSD unit personnel receive training appropriate to their tasks. The training director  
30 also reviews documentation, including feedback from audits, operating logs, emergency exercise  
31 critiques, and employee recommendations, for possible inclusion into the TSD unit training programs.

**Table H-1. Minimum Training Matrix for TSD Unit Personnel.**

<b>TASK</b>	<b>AUDIENCE</b>	<b>INITIAL EMPLOYEE TRAINING</b>	<b>RAD TRAINING<sup>1</sup></b>	<b>24-HOUR OSHA<sup>1</sup></b>	<b>ANNUAL TRAINING</b>	<b>APPLICABLE SECTIONS OF RCRA PERMIT<sup>2</sup></b>
D&D operations personnel that perform treatment, storage, and disposal facility (TSDF) operations, or supervise those operations, and are exposed to the hazards of the TSDF. These employees have duties that may bring them into contact with hazardous/mixed waste. Therefore, these employees are required to complete 24-hr HAZWOPER Qualification.	D&D TSDF Worker	X	X	X	X	C, D, F, G
D&D operations personnel that perform TSDF operations, or provide system-specific operational direction (i.e., facility operations managers, facility system engineers, facility environmental representatives). These employees are not directly exposed to the hazards of the TSDF but must be cognizant of the RCRA-related requirements for the RCRA units addressed in this permit [for instance, these employees are not required to wear personal protective equipment (PPE) and are not required to complete 24-hour HAZWOPER]	D&D Incidental TSDF Worker	X	X		X	C, D, F, G

**Table H-1. (continued)**

<b>TASK</b>	<b>AUDIENCE</b>	<b>INITIAL EMPLOYEE TRAINING</b>	<b>RAD TRAINING<sup>1</sup></b>	<b>24-HOUR OSHA<sup>1</sup></b>	<b>ANNUAL TRAINING</b>	<b>APPLICABLE SECTIONS OF RCRA PERMIT<sup>2</sup></b>
Support employees for D&D operations who enter TSDF areas unescorted and provide support functions that may bring them into contact with hazardous/mixed waste at the TSDF. These employees are required to complete 24-hour HAZWOPER Qualification. Examples of work activities include radiological surveys, maintenance planning, life safety systems, and surveillance. Examples of work that may be included are Crafts, Radcon, Quality Inspectors or Technicians, Facility Engineers, Life Safety System Engineers, EAMs, Waste Handlers, and Subcontractors.	D&D TSDF Support Worker	X	X	X	X	F, G
Support employees D&D who enter TSDF areas unescorted and provide support functions and are not directly exposed to the hazards of the TSDF (for instance, these employees are not required to wear PPE and are not required to complete 24-hour HAZWOPER). Examples of workers that may be included are Environmental, Safety, and Health (ES&H) Support Engineers, Hygienists, Support Engineers, Planners, Senior Supervisory Watch (SSW), and Quality Engineers.	D&D TSDF Incidental Support Worker	X	X		X	F, G

**Table H-1. (continued)**

<b>TASK</b>	<b>AUDIENCE</b>	<b>INITIAL EMPLOYEE TRAINING</b>	<b>RAD TRAINING<sup>1</sup></b>	<b>24-HOUR OSHA<sup>1</sup></b>	<b>ANNUAL TRAINING</b>	<b>APPLICABLE SECTIONS OF RCRA PERMIT<sup>2</sup></b>
INTEC EAM conducts operations-related response; coordinates protective actions or protective action recommendations; authorizes response resources; satisfies federal, state, and local requirements and declares the INTEC Emergency Control Center operational.	INTEC Emergency Action Managers	X	X	X	X	G
<sup>1</sup> . Personnel who are not exposed to the hazards of the regulated units may not require this training. <sup>2</sup> . Personnel receive training related to the permit section as appropriate to their job function.						
Section C – Waste Characterization						
Section D – Process Information						
Section F – Procedures to Prevent Hazards						
Section G – Preparedness, Prevention, and Contingency Plan						

1 **H-1d. Relevance of Training to Job Tasks [IDAPA 58.01.05.008; 40 CFR 264.16(a)(2)]**

2  
3 Individual training program profiles are prepared for each TSD unit position that requires a  
4 formal training program.

5  
6 At a minimum, each individual training program profile identifies the following:

- 7  
8 • Job description  
9  
10 • Qualifications  
11  
12 • Training requirements.

13  
14 Profiles typically identify qualification requirements. Occasionally, a position may require  
15 specialized training. Special-case training is documented in individual training records. Profiles include  
16 requirements for hazardous/mixed waste management or handling and emergency response training.

17  
18 Supervisors have the responsibility for evaluating training requirements for TSD employees.  
19 These supervisors receive additional training in how to conduct and evaluate OJT.

20  
21 Individuals who demonstrate an equivalency for specific requirements or prerequisites identified  
22 in the training profile may be exempted from requirements in accordance with established procedures.  
23 Exemptions/equivalencies must be approved by the training director. Each exemption/equivalency is  
24 granted in writing and documented in the individual's training record.

25  
26 **H-1e. Training for Emergency Response [IDAPA 58.01.05.008; 40 CFR 264.16(a)(3)]**

27  
28 Emergency response training is provided to all personnel assigned to or associated with TSD  
29 units, including specialized training for employees with specific emergency action responsibilities, such  
30 as the EAM and Emergency Response Organization (ERO) personnel. The following presents an  
31 overview of the emergency response training.

1 General emergency response training of TSD unit ERO personnel includes training on the ICP  
2 EP/RCRA CP which covers the following topics:

- 3
- 4 • Spill Control Plan
- 5
- 6 • Evacuation/accountability
- 7
- 8 • Emergency drill/exercise
- 9
- 10 • RCRA
- 11
- 12 • Emergency Plan Implementing Procedures
- 13
- 14 • Emergency preparedness
- 15
- 16 • Incident command system
- 17
- 18 • Inspection and repair of facility emergency monitoring equipment.
- 19

20 ERO members respond to emergency events. ERO members receive initial training and annual  
21 requalification training, in addition to training provided to general employees. Training of ERO members  
22 is outlined by position in company procedures. All employees receive general employee emergency  
23 response action training.

24

25 **H-2. Implementation of Training Program [IDAPA 58.01.05.008; 40 CFR 264.16(b),**  
26 **264.16(d)(4), 264.16(e)]**

27

28 After completion of new employee orientation, designated employees enter a training program  
29 specific to their job assignment. Persons holding qualifications are retrained and reevaluated as mandated  
30 by procedures. Job assignments which are required for the completion of a training program have time  
31 and performance limitations that must be satisfied to meet program qualification criteria.

32

33 RCRA training is completed within the first six months of the individual's employment or

1 assignment, and at least annually thereafter, for positions involving TSD unit operations. Throughout the  
2 training program and until completion, employees do not perform their job duties unsupervised.

3  
4 **H-3. Training Records [IDAPA 58.01.05.008; 40 CFR 264.16(d)(4) and (e)]**

5  
6 Individual training records are maintained for personnel assigned to TSD units. Training records  
7 include documentation of completed training, such as class rosters, signed checklists, completed exams,  
8 data base printouts from additional training classes attended, and other documents verifying training. The  
9 original training records are maintained by the presenting organizations, which enter course completion  
10 information into a database. A hard copy of this information is also entered into the individual's training  
11 record.

12  
13 The training records include the names of employees filling each TSD unit position. Job tasks  
14 and associated training requirements for each TSD unit are found in Table H-1.

15  
16 Individual training records include, as a minimum, the following:

- 17  
18 • Initial training and retraining programs  
19  
20 • Attendance records of training received  
21  
22 • Results of exams, walk through, and job performance assessments related to certification.  
23

24 Training records for current employees at each TSD unit are maintained until closure of the unit  
25 or the employee terminates or transfers to a non-TSD unit position. The training records of terminating  
26 employees are maintained at the TSD unit for a minimum of three years from the date the employee last  
27 worked at a TSD unit. The training records for TSD unit employees who transfer to a non-TSD unit  
28 position within the company are forwarded to the employee's new organization where they continue to be  
29 available for at least three years.