# Section H
# Personnel Training

# Section H — Personnel Training

## Contents


**Section** **Page**

1. General Information ..... 1
2. Employee Information [-330 (2)(a)] ..... 1
   - 2.1. Employee Organization ..... 1
   - 2.2. Job Titles and Descriptions ..... 1
   - 2.3. Training Coordinators/Instructors ..... 2
3. Outline of Training Program [-330 (1); -806 (4)(a)(xii);] ..... 3
   - 3.1. Training Content, Frequency, and Techniques ..... 3
   - 3.2. Initial Instruction ..... 3
   - 3.3. Refresher Courses (-330 (1)(b)) ..... 4
   - 3.4. On-the-Job Training ..... 4
   - 3.5. Tailgate Meetings ..... 5
4. Implementation of Training Program [330(1)(c), 330(2)(c), 330(3)] ..... 5
   - 4.1. Training Schedules ..... 5
   - 4.2. Training Records (-330(3)) ..... 5
   - 4.3. Effectiveness of Training Program ..... 6


## Tables

(Located at end of text)


H-1 Job Titles and Duties Related to Dangerous Waste Management ..... H-8
H-2 Training Matrix – Permitted Unit ..... H-9
H-3 OJT Training Topics ..... H-10


## Figure

(Located at end of text)


H-1 Organization Chart – Hazardous Materials Building ..... H-12


## Attachments

(Located at end of text)

H-1 Course Descriptions
H-2 OJT Training Record

# Section H — Personnel Training
# WAC 173-303-330 & 806(4)(a)(xii)

## 1. General Information

1.1. The purpose of Section H is to describe the Dangerous Waste Training Program for personnel whose job duties are related to dangerous waste management at the Hazardous Materials Building (also referred to as the HMB and Permitted Unit) of the Bonneville Power Administration's Ross Complex.

1.2. The training program is designed to ensure that employees, emergency responders, and occasional site workers involved with operations at the Permitted Unit (site workers) are adequately trained to perform their duties safely and in a manner that is protective of human health and the environment.

1.3. The training program is additionally designed to ensure that site workers are adequately trained regarding the requirements of WAC 173-303; the Resource, Conservation, and Recovery Act (RCRA) Permit; and applicable local, state, and federal regulations to ensure the Ross Complex is operated in a manner compliant with these regulations.

1.4. The training program is implemented using a combination of classroom, on-line, and on-the-job training methods in a format that includes lectures, meetings, videos, demonstrations, and practice scenarios.

## 2. Employee Information [-330 (2)(a)]

### 2.1. Employee Organization

2.1.1. Figure H-1 is an organization chart that identifies personnel, by job title, whose responsibilities are related to dangerous waste management at the Permitted Unit. Note that some of the BPA personnel listed on the organization chart are located at the Ross Complex and some are at other BPA locations.

### 2.2. Job Titles and Descriptions

2.2.1. An employee's level of training is defined by their job title and duties, as detailed in Table H-1 and described below:

2.2.1.1. **Hazardous Materials Building Manage**r – Responsible for Regulatory Compliance at the Permitted Unit. Serves as Alternate Emergency Coordinator for Permitted Unit.

2.2.1.2. **Electrical Utility Material Handler Foremen (I, II, or III)** – Responsible for management of Material Handlers and for daily waste management operations at the Permitted Unit. Serve as Alternate Emergency Coordinator at Permitted Unit.

2.2.1.3. **Electrical Utility Material Handlers** – Responsible for management of wastes stored at the Permitted Unit (inspections, container management, sampling, testing, verification, and paperwork).

2.2.1.4. **Hazardous Material Building Environmental Assistant** – Responsible for administrative duties related to waste management at the Permitted Unit (waste tracking system, operating record filing, reporting, and administrative tasks).

2.2.1.5. **Ross Complex Environmental Specialist** – Responsible for overall Environmental Regulatory Compliance at the facility.

2.2.1.6. **BPA Corporate Environmental Training Coordinator** – Responsible for training plan development and implementation (course and vendor schedules).

2.2.1.7. **Chemist** – Responsible for waste analysis, profiling, and vendor lab audits.

2.2.1.8. **Emergency Coordinator/Facility Incident Commander** – Serves as Primary Emergency Coordinator for the Permitted Unit and Incident Commander for the facility.

2.2.1.9. **Dangerous Waste Generators** – Manage generated wastes prior to shipment to the Permitted Unit.

2.2.1.10. **District Field Environmental Leads** – Responsible for working with dangerous waste generators to manage wastes prior to shipment to the Permitted Unit

2.2.1.11. **Occasional Site Workers** – For the purposes of this training plan, occasional site workers are defined as those persons who work at the Permitted Unit on only a sporadic basis and whose duties do not present an exposure or possibility of exposure to safety and health hazards from waste storage or handling. These employees could include other craft personnel such as painters, plumbers, or electricians. In all such cases, occasional site workers will work only under the supervision of a fully trained site worker and only on tasks not directly related to dangerous waste management.

## 2.3. Training Coordinators/Instructors

2.3.1. The training program is directed at the BPA corporate level by the Environmental Training Coordinator and at the facility level by the HMB Manager. The minimum education level required for either position is a Bachelor's degree and a minimum of 5 years of experience in the field of environmental management.

2.3.2. For vendor-provided classroom training, the instructor is an expert in the field. For on-the-job training (OJT), the instructor is a person who is fully trained for the position of responsibility and is skilled in the current methods of performing the tasks.

# 3. Outline of Training Program [-330 (1); -806 (4)(a)(xii);]

## 3.1. Training Content, Frequency, and Techniques

3.1.1. Through initial classroom instruction and annual refresher courses, employees receive instruction about general regulations, safety instructions, and the nature of the wastes handled at the HMB. OJT is conducted to provide job-specific assistance to individual employees. This combination of training prepares the employees to operate or maintain the Permitted Unit in a safe and regulatory-compliant manner.

3.1.2. At a minimum, site workers will meet the requisite skills and qualifications for their position as outlined in Table H-2 and according to WAC 173-303-330(2)(a).

3.1.3. An outline of the OJT training topics is presented in Table H-3.

3.1.4. Course outlines for the training classes listed in Table H-2 are included in Attachment H-1.

## 3.2. Initial Instruction

3.2.1. Each new or transferred employee must complete initial training outlined in this section within 6 months of the first day on the job at the Permitted Unit.

3.2.1.1. **Treatment, Storage, and Disposal (TSD) HAZWOPER (24 Hours):** At a minimum, selected site workers identified in Table H-2 are required to attend this 24-hour course designed to meet the requirements of OSHA 29 CFR 1910.120(p)(7) and WAC 173-303-330(1)(d).

3.2.1.2. **Basic Waste Management (1-2 Hours)**: This class is designed to give employees responsible for managing waste a basic overview of current regulatory requirements and their impacts and implementation at BPA. The duration of training is tailored to the individual needs of each position at BPA.

3.2.1.3. **Incident Command System (24 Hours):** Persons listed as either Emergency Coordinators or Alternate Emergency Coordinators in the Contingency Plan for the Ross Complex and Permitted Unit are required to complete a 24hour Incident Command Course.

3.2.1.4. **Contingency Plan Awareness (1-2 Hours):** Contingency Plan Awareness is presented in the form of OJT. New employees at the Permitted Unit are required to read and be familiar with the Contingency Plan. The Plan is reviewed with either the Building Manager or with the Material Handler Foreman as a part of the initial OJT.

3.2.1.5. **Waste Analysis Plan Training (1-2 Hours):** This class is designed to provide an overview to BPA TSD workers, chemists, and other staff working with Chemical Waste Profiling of BPA permitting requirements, as well as individual worker responsibilities for profiling waste prior to acceptance at the Permitted Unit.

## 3.3. Refresher Courses (-330 (1)(b))

3.3.1. Refresher requirements vary based on job description and job duties, as detailed in Table H-2. Refresher courses are described below and course outlines are included in Attachment H-1. With the exception of the Department of Transportation (DOT) training that is required every 3 years, the following courses are required annually.

3.3.1.1. **TSD HAZWOPER Refresher (8 Hours):** This course reviews important aspects of the 24-hour TSD HAZWOPER Training, including health and safety, emergency response, hazard communication, and personal protective equipment (PPE). The annual Contingency Plan Awareness Refresher is provided as a portion of this course.

3.3.1.2. **Basic Waste Management Refresher (1-2 Hours):** Waste management is provided annually by classroom instruction, by on-line training modules, or by OJT.

3.3.1.3. **Incident Command System Refresher (Varies):** Incident Command System refresher courses are incorporated into facility drills or OJT.

3.3.1.4. **Contingency Plan Awareness Refresher (Varies):** Contingency Plan Awareness is provided in the TSD HAZWOPER Refresher course annually and is also discussed in OJT review sessions. This may be in the form of meetings to review updates to the plan or a drill carried out to test the emergency response procedures.

3.3.1.5. **DOT Requirements (Varies):** This course reviews the DOT regulations and function-specific requirements for packaging, labeling, and shipping wastes.

3.3.1.6. **Waste Analysis Plan Refresher (1 Hour):** Workers are required to review the Waste Analysis Plan on an annual basis. This requirement could be met as part of a tailgate meeting, inclusion into the annual TSD refresher, or by certification that the plan has been reviewed and is understood. Delivery methods will vary.

## 3.4. On-the-Job Training

3.4.1. Material Handlers working in the Permitted Unit receive job-specific instruction in the form of OJT. OJT can include meetings, hands-on demonstrations, working under the guidance of a trained mentor, and/or review of written material such as operating procedures. The purpose of OJT is to familiarize employees with proper dangerous waste management procedures and provide location-specific, task-specific, hands-on training to supplement classroom training.

3.4.2. OJT is considered a part of a transition for new employees. It is continued with the new employee for a minimum of 2 weeks or until such time as the Material Handler Foreman is confident that the new employee has sufficient knowledge to work independently and remain in compliance with the dangerous waste regulations

applicable to the Permitted Unit. OJT topics are also reviewed annually with Material Handlers, as indicated in Attachment H-2.

3.4.3. OJT is typically presented by the Permitted Unit Building Manager, a Material Handler Foreman, or a fully trained journeyman level Material Handler.

3.4.4. Job topics typically discussed in OJT sessions are listed in Table H-3.

### 3.5. Tailgate Meetings

3.5.1. "Tailgate" meetings are held at the Permitted Unit as necessary to discuss changes in safety policies, operating procedures, regulations, review of OJT topics, or other pertinent topics that affect dangerous waste handling procedures. Occasional site workers are also briefed prior to beginning work at the Permitted Unit.

## 4. Implementation of Training Program [330(1)(c), 330(2)(c), 330(3)]

### 4.1. Training Schedules

4.1.1. Training schedules, number of hours required for each training course, and positions that require completion of each course are listed in Table H-2.

4.1.2. Initial instruction is completed within 6 months of an employee starting in a new position in the Permitted Unit. Pursuant to WAC 173-303-330(1)(c), new employees and employees performing positions of responsibility for which they are not fully trained will be supervised until they complete the required training for that position of responsibility as outlined in this training plan.

4.1.3. OJT starts immediately upon performing work duties and continues for a minimum of 2 weeks, or until such time as the new employee completes the OJT sessions listed in Table H-3. OJT topics are also reviewed annually, as indicated in Attachment H-2.

4.1.4. The Environmental Training Coordinator is responsible for preparation and implementation of the training plan and for scheduling all vendor and in-house training annually with the exception of on-the-job training. The HMB Manager is responsible for ensuring that OJT is conducted as required and for making the final determination that employees working in the Permitted Unit have successfully completed all required training.

### 4.2. Training Records (-330(3))

4.2.1. The HMB Manager maintains a log in the Permitted Unit's Operating Record that tracks employee OJT and the dates it was provided. A sample OJT Training Record is included in Attachment H-2.

4.2.2. The HMB Manager maintains records of Tailgate Meetings, including content/agenda, meeting date, and attendees, in the Permitted Unit's Operating Record.

4.2.3. BPA maintains an Official Training Record for each employee electronically. This training database is used to store data, including employee name, training course and

course number, and dates of completion for vendor-provided training and for formal in-house training courses. Training records of current personnel must be kept until closure of the facility. Training records on former employees must be kept for at least 3 years from the date the employee last worked at the facility. Course curricula for vendor-provided training will be placed in the operating record at the Permitted Unit.

4.2.4. Training class certificates of completion are issued to each employee upon successful completion of a class.

## 4.3. Effectiveness of Training Program

4.3.1. The Environmental Training Coordinator receives updates throughout the year of discrepancies found during the TSD weekly/monthly inspections, Ecology inspections, and inspections of other areas on the Ross complex. Topics are added to the training curriculum to highlight and address any reoccurring discrepancies.

# Tables – Section H

**Table H-1**
**Job Titles and Duties Related to the Permitted Unit**

| Job Title | Regulated Waste Duties | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Perform Inspections | Load/Unload & Storage Placement | Emergency Response | Sampling/Testing/Verification | Container Handling/Consolidation | Accepting/Rejecting Wastes | Preparation of Waste for Shipment | Waste Analysis/Waste Characterization | Develop/Implement Training Program | Waste Tracking | Operating System Records Management | Building Maintenance and Repair |
| **Hazardous Materials Building Manager** | | | X | | | X | | X | | | X | |
| **Electrical Utility Material Handler Foreman** | X | X | X | X | X | X | X | | | | | |
| **Electrical Utility Material Handlers** | X | X | X | X | X | X | X | | | | | |
| **Hazardous Materials Building Environmental Assistant** | | | | | | | | | | X | X | |
| **Ross Complex Environmental Specialist** | X[1] | | X | X | | | | X | | | | |
| **BPA Corporate Environmental Training Coordinator** | | | | | | | | | X | | | |
| **Chemists** | | | | | | | | X | | | | |
| **Emergency Coordinators/Incident Commanders** | | | X | | | | | | | | | |
| **Dangerous Waste Generators** | | | | | | | | X | | | | |
| **Occasional Site Workers** | | | | | | | | | | | | X |

[1] Inspections are performed on Ross Complex Distillation Units.

**Table H-2**
**Training Matrix – Permitted Unit**

| Job Positions | Training Courses | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | TSD HAZWOPER 24 hours | TSD HAZWOPER Refresher 8 hours | Basic Waste Management –Initial/Refresher 1-4 hours | Incident Command System 24 hours | Incident Command System Refresher | OJT/Tailgate Meetings – Initial/ Refresher | HMB Contingency Plan Awareness | Annual HMB Contingency Plan Awareness Refresher | DOT Training (Every Three Years) | Waste Analysis Plan - Initial / Refresher 1-2 hours |
| **Hazardous Materials Building Manager** | X | X | | | | X | X | X | X | X |
| **Electrical Utility Material Handler Foreman** | X | X | | | | X | X | X | X | X |
| **Electrical Utility Material Handlers** | X | X | | | | X | X | X | X | X |
| **Hazardous Materials Building Environmental Assistant** | | | | | | X | X | X | X | |
| **Chemists** | | | | | | A | | | | X |
| **Emergency Coordinators/Incident Commanders** | | | | X | X | | X | X | | |
| **Ross Complex Environmental Specialist** | X | X | | X | X | A | X | X | X | X |
| **Dangerous Waste Generators** | | | X | | | | | | X | |
| **Occasional Site Workers** | | | | | | A | | | | |

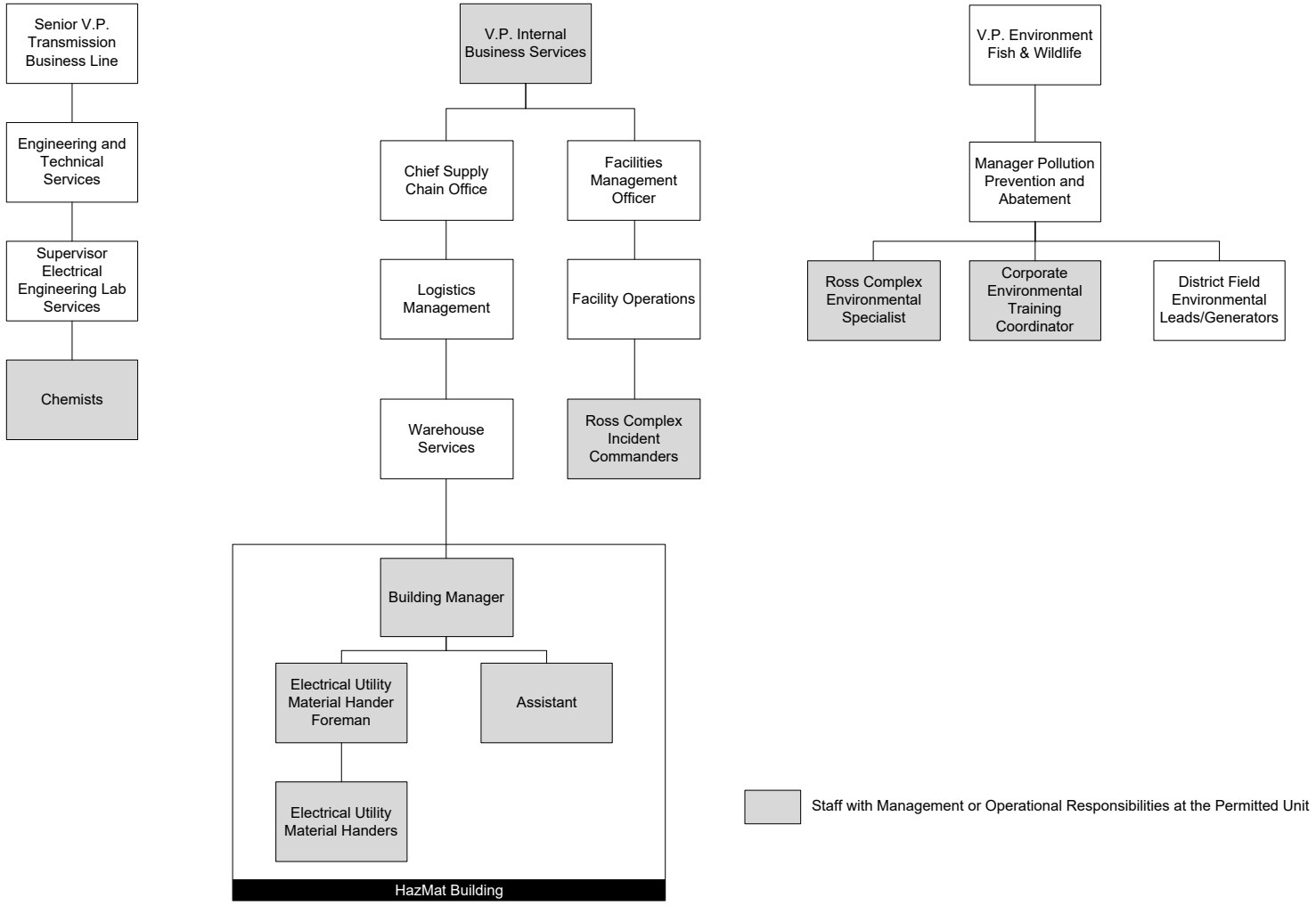
X = Required; A = As Needed

## Table H-3
## OJT Training Topics

| Topic | Elements |
|---|---|
| **Part B Permit** | Overview of Facility Permit |
| **Incoming Waste Acceptance** | Inspection and verification against manifest |
| | Waste loading/unloading procedures |
| | Sampling containers for verification/ characterization |
| | Sampling Oils for Halogens |
| | Acceptable Waste codes |
| | Sorting household batteries |
| | Preparing light tubes for storage (packaging/counting/labeling) |
| **Container Management** | Container Storage-Waste Compatibilities |
| | Container Inspections |
| | Combining Containers |
| | Compactor/Drum Crusher operations |
| | Labeling Containers for Storage |
| **Inspection Procedures** | Conducting Daily, Weekly, Monthly Inspections |
| | Inspection of emergency equipment (fire extinguishers, eyewash stations, alarms) |
| **Preparing Waste for Shipment** | Labels, manifests, shipping papers |
| | Packaging light tubes |
| **Emergency Response** | Contingency Plan Implementation |
| | Incident Reporting |
| | Communications, Alarms, Evacuation Routes |
| | Emergency Response equipment use, maintenance, repair |
| | Site Shutdown Procedures |
| | Response to fire, explosion or spills |

# Figure – Section H

**Figure H-1**
**Organization Chart – Positions Related to the Permitted Unit**




Shaded boxes indicate staff associated with Permitted Unit or have overall responsibility for the Permitted Unit.

# Attachments – Section H

# Attachment H-1
# Course Descriptions

# TSD HAZWOPER INITIAL TRAINING

OSHA 29 CFR 1910.120 (p)(7)(i)
WAC 173-303-330(1)(d)

This is an initial 24-hour course for workers who have the potential to become exposed to health hazards or hazardous substances at a RCRA Treatment Storage Disposal (TSD) Operation. The course is designed to enable site workers to perform their duties and functions in a safe and healthy manner. This class may incorporate information relevant to meet other training requirements.

**HOURS:**

24 Duty Hours

**OBJECTIVE:**

The training course will thoroughly cover the following:

- Recognition, evaluation and control of safety hazards specific to BPA wastes;
- Proper handling of drums and containers;
- Emergency incident response provisions including HMB Contingency Plan Awareness and Implementation;
- Safe use of control equipment;
- Selection and use of appropriate PPE;
- Recognition and response to overexposure or injury of self or others;
- Procedures for using, inspecting, repairing, and replacing BPA facility emergency and monitoring equipment;
- Response to ground water contamination incidents;
- Shutdown of operations

Employees and supervisors that have received and successfully completed the training shall be certified. The vendor, through the COR, will issue a pocket certificate to each employee.

**WHO SHOULD ATTEND**: This course is intended for those employees who work at BPA's Ross Complex Treatment, Storage and Disposal Facility (HMB), Chemistry Lab Employees that support the TSD, Ross Complex Environmental Specialist, and Ross Complex Emergency Coordinators.

**COURSE NUMBER**: 802

# TSD HAZWOPER ANNUAL REFRESHER

OSHA 29 CFR 1910.120 (p)(7)(ii)

This is a 1-day course for workers in BPA's TSD Facility who have previously completed the 24-hour TSD HAZWOPER course. This class may incorporate information relevant to meet other training requirements.

**HOURS:**

8 Duty Hours

**OBJECTIVE:**

This training course will review important aspects of the 24-hour HAZWOPER training that will include BPA's health and safety program, medical surveillance, decontamination, emergency response, hazard communication, PPE and new technology.

Additional topics will include:

- Recognition, evaluation and control of safety hazards on site;
- Proper handling of drums and containers on site;
- Emergency incident response provisions (BPA's SPCC Plan and Contingency Plan);
- Selection and use of proper PPE;
- Recognition and response to overexposure or injury of self and others;
- Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment;
- Response to fires and explosions;
- Response to groundwater contamination incidents;
- Shutdown of operations
- BPA operating procedures

Employees and supervisors that have received and successfully completed this training shall be certified. The vendor, through the COR, will issue a pocket certificate to each employee.

**WHO SHOULD ATTEND:** This course is intended for those employees who work at BPA's Ross Complex Treatment, Storage and Disposal Facility (HMB), Chemistry Lab Employees that support the TSD, Ross Complex Environmental Specialist, and Ross Complex Emergency Coordinators.

**COURSE NUMBER**: 803

# ON SCENE INCIDENT COMMAND

OSHA 29 CFR 1910.120 (q)(v)

This is an initial 24-hour course for personnel who will assume control of the incident scene beyond the first responder awareness level during an emergency response situation.

**HOURS:**

24 Duty Hours

**OBJECTIVES:**

Incident commanders receive training equivalent to the first responder operations level and in addition have competency in the following areas:

- Know and be able to implement the employer's incident command system.
- Know how to implement the employer's emergency response plan. For BPA, this is the Contingency Plan for the Ross Complex and Permitted Unit.
- Know and understand the hazards and risks associated with employees working in chemical protective clothing.
- Know how to implement the local emergency response plan.
- Know of the state emergency response plan and of the Federal Regional Response Team.
- Know and understand the importance of decontamination procedures.

**WHO SHOULD ATTEND:** Emergency Coordinators, Environmental Specialist at Ross Complex, HMB Manager, and Material Handler Foreman

**COURSE NUMBER:**

# ON SCENE INCIDENT COMMAND ANNUAL REFRESHER

OSHA 29 CFR 1910.120 (q)(v)

Those employees who are trained in accordance with paragraph (q)(6) shall receive annual refresher training of sufficient content and duration to maintain their competencies.

**HOURS:**
Varies

**OBJECTIVES:**
Show competencies in first responder operations level as well as the following OSHA requirements:

- Know and be able to implement the employer's incident command system.
- Know how to implement the employer's emergency response plan. For BPA, this is the Contingency Plan for the Ross complex.
- Know and understand the hazards and risks associated with employees working in chemical protective clothing.
- Know how to implement the local emergency response plan.
- Know of the state emergency response plan and of the Federal Regional Response Team.
- Know and understand the importance of decontamination procedures.

**WHO SHOULD ATTEND:** Emergency Coordinators, Environmental Specialist at Ross Complex, HMB Manager, and EU Material Handler Foremen

**COURSE NUMBER:**

# BASIC WASTE MANAGEMENT

40 CFR 265.16; 262.17(a)(7); 262.16(b)(9)

A CLASS DESIGNED TO GIVE EMPLOYEES RESPONSIBLE FOR MANAGING WASTE A BASIC OVERVIEW OF CURRENT REGULATORY REQUIREMENTS AND THEIR IMPACTS AND IMPLEMENTATION AT BPA.

**HOURS:**

1 TO 4 HOURS

**OBJECTIVES:**

AFTER COMPLETION OF THE COURSE, THE PARTICIPANTS WILL HAVE A BETTER OVERALL UNDERSTANDING OF PROPER WASTE MANAGEMENT PRACTICES IMPACTING THEIR ACTIVITIES AT BPA. PARTICIPANTS WILL LEARN KEY PERSONNEL WITHIN BPA AVAILABLE TO ASSIST THEM IN CARRYING OUT THESE REQUIREMENTS IN THEIR DAY TO DAY ACTIVITIES. SUBJECTS INCLUDED BUT NOT LIMITED TO THE FOLLOWING:

- BASIC RCRA REGULATIONS
- DESIGNATION OF HAZARDOUS WASTE – IDENTIFIED WASTE STREAM HANDBOOK
- CRADLE TO GRAVE MANAGEMENT AND TRACKING
- STANDARDS FOR GENERATORS, TRANSPORTERS, TSD FACILITIES
- FACILITY STANDARDS/CATEGORIES/REQUIREMENTS – WHO IS REGULATED
- GENERATORS, TRANSPORTERS, TSD FACILITIES
- NOTIFICATION OF HAZARDOUS WASTE ACTIVITY,
- ACCUMULATION/STORAGE
- CONTAINER MANAGEMENT
- PREPARATION FOR SHIPMENT—LABELING, PACKAGING
- MANIFEST
- PERSONNEL TRAINING
- RECORD KEEPING/REPORTING
- DIFFERENCES BETWEEN FEDERAL AND STATE REQUIREMENTS

***Additional Training Required for Large Quantity Generators:***

***Contingency/SPCC Plans***

- Explain the difference between the Ross Contingency Plan, Permitted Unit Contingency Plan, and the Ross SPCC Plan
- Notification procedures
- Emergency procedures, understanding the role of a spill responder
- Understand the hazards, both chemical and physical, that may be present during a spill response
- Protective methods to prevent exposure
- Use of personal protective equipment (PPE)
- Presence and storage of hazardous materials/waste

**WHO SHOULD ATTEND:** ALL EMPLOYEES LOCATED AT LARGE QUANTITY GENERATOR FACILITIES (CURRENTLY ROSS COMPLEX ONLY) THAT HANDLE WASTE ARE REQUIRED TO ATTEND.

EMPLOYEES AT SMALL QUANTITY GENERATOR FACILITIES THAT HANDLE WASTE MUST ATTEND INITIAL TRAINING PER 40 CFR 262.34(D)(5)(III). BECAUSE MOST BPA FACILITIES FLUCTUATE BETWEEN SMALL QUANTITY AND CONDITIONALLY EXEMPT, AND BECAUSE EMPLOYEES MOVE AROUND BETWEEN FACILITIES, EMPLOYEES AT THESE SITES ARE ALL TRAINED TO THE SQG LEVEL AS A BEST MANAGEMENT PRACTICE (BMP). REFRESHERS ARE ALSO PROVIDED TO THESE PERSONNEL AS A BMP.

**COURSE NUMBER**: 798

# DEPARTMENT OF TRANSPORTATION REGULATIONS

## 49 CFR 172.704

THE PURPOSE OF THIS CLASS IS TO PROVIDE PARTICIPANTS WITH THE INFORMATION NEEDED TO COMPLY WITH DOT HAZARDOUS MATERIALS SHIPPING REGULATIONS.

**HOURS:**

2 TO 4 HOURS

**OBJECTIVES:**

After completion of the course, the participants will have a better overall understanding of proper shipping requirements, including completion of shipping papers and proper marking and labeling of containers. Subjects included but not limited to the following:

### DOT REGULATIONS GENERAL AWARENESS

- HAZARDOUS MATERIALS TRANSPORTATION ACT
- EMERGENCY RESPONSE

### FUNCTION SPECIFIC CONTENT

- 49 CFR 171
  - DEFINITIONS
  - ACCIDENT REPORTING REQUIREMENTS
- 49 CFR 172
  - USE OF SHIPPING TABLES
  - SHIPPING PAPERS
  - MARKING
  - LABELING
  - PLACARDING
- 49 CFR 173
  - DOT HAZARD CLASSES
  - PRECEDENCE
  - SEGREGATION
  - PACKAGING

**WHO SHOULD ATTEND:** GENERATORS, MATERIAL HANDLERS, MATERIAL HANDLER FOREMEN, ENVIRONMENTAL SPECIALISTS

**COURSE NUMBER**: 004516

# WASTE ANALYSIS PLAN

**(Initial and Annual Refresher)**

The purpose of this class is to provide participants with the information necessary to comply with BPA's Dangerous Waste Storage Permit, specifically where it concerns waste profiling, waste analysis, acceptance, and verification prior to storage at the BPA HMB.

**HOURS:**

1 to 2 Hours

**OBJECTIVES:** After completion of the course, participants will have a better overall understanding of the requirements in the "Section C – Waste Analysis Plan" portion of BPA's Dangerous Waste Permit. Subjects include but are not limited to the following:

- What is the WAP; what purpose does it serve
- What is and is not allowed to be accepted at the Permitted Unit
- Responsibilities for Waste profiles: Generator; Chemist; Environmental Personnel; TSD
- Representative Sampling Requirements
- QA/QC Requirements
- Re Profiling Requirements
- Self-Audit Requirements
- Acceptable methods for development of the profile
- Waste acceptance procedures at HMB – Verification
    - Tier I
    - Tier II
    - Tier III
    - Representative Sampling
    - Required Analyses
- Discrepancies and Non Acceptance procedures

**WHO SHOULD ATTEND:** BPA Chemists responsible for profiling wastes; Ross Complex Environmental Specialist; and the following TSD Workers: HMB Manager; Electrical Utilities Material Handlers /Foremen working at the HMB;

**COURSE NUMBER**: TBD

# Attachment H-2
# Sample OJT Training Log

| Topic | Element | Requirement (Circle) | Employee Signature and Date | Trainer Signature and Date |
|---|---|---|---|---|
| **Emergency Response** | Contingency Plan Awareness<br>• Employee has read and understands the Plan | Initial<br>Annual Review in TSD HAZWOPER Course | | |
| | Incident Reporting<br>• Employee has reviewed notification requirements of both Contingency Plan and SPCC<br>• Employee knows who to notify in a spill or other response incident | Initial<br><br>Annual Review in TSD HAZWOPER Course | | |
| | Communications, Alarms, Evacuation Routes<br>• Employee has participated in drill or exercise | Initial<br><br>Annual Review in Job Briefing | | |
| | Emergency Response Equipment<br>• Employee has been trained to operate fire extinguisher<br>• Employee has operated emergency shower<br>• Employee knows locations of fire alarms and how to activate | Initial<br><br>Annual Review in Job Briefing | | |
| | Daily Site Shutdown procedures<br>• Employee has reviewed and understands operating procedures | Initial<br><br>Annual Review in Job Briefing | | |
| | Response to Fire, Spill, Explosion | Initial | | |

| Topic | Element | Requirement (Circle) | Employee Signature and Date | Trainer Signature and Date |
|---|---|---|---|---|
| | • Employee has participated in drill or discussion | Annual review in TSD Course | | |
| **Incoming Waste Acceptance** | Inspection and Verification Against Manifest<br>• Employee trained to recognize manifest discrepancies | Initial<br><br>Annual Review in Job Briefing | | |
| | Waste Loading/Unloading Procedures<br>• Employee understands operating procedures | Initial<br><br>Annual Proficiency Demonstration/ Biennial Forklift Certification | | |
| | Sampling containers for verification/characterization<br>• Employee understands container closure requirements of 40 CFR Part 264 Subpart CC for air emission standards<br>• Employee has been taught representative sampling techniques<br>• Employee understands verification requirements of permit | Initial<br><br>Annual Review in Job Briefing | | |
| | Sampling Oils for Halogens<br>• Employee has demonstrated proper use of meter | Initial<br><br>Annual Proficiency Demonstration | | |
| | Acceptable Waste codes<br>• Employee has reviewed Part A of Permit and understands codes and acceptance procedures | Initial<br><br>Annual Review in Job Briefing | | |

| Topic | Element | Requirement (Circle) | Employee Signature and Date | Trainer Signature and Date |
|---|---|---|---|---|
| | Sorting household batteries<br>• Employee understands hazard classes and compatibilities for batteries | Initial<br><br>Annual Review in Job Briefing | | |
| | Light Tubes<br>• Employee understands packaging, labeling and counting requirements of Universal Waste Rules | Initial<br><br>Annual Review in Job Briefing | | |
| **Container Management** | Waste Compatibilities<br>• Employee understands hazard classes and compatibility charts | Initial<br><br>Annual Review in TSD course | | |
| | Container Inspections<br>• Employee understands elements of container inspection checklist | Initial<br><br>Annual Proficiency Demonstration | | |
| | Combining Containers<br>• Employee has been trained in bulking procedures | Initial<br><br>Annual Review in Job Briefing | | |
| | Compactor/Drum Crusher operations<br>• Employee has been trained to use drum crusher/compactor and has demonstrated proper use | Initial<br><br>Annual Proficiency Demonstration | | |
| | Labeling Containers for Storage<br>• Employee understands Labeling requirements of WAC and DOT | Initial<br><br>Annual Review in Job Briefing | | |

| Topic | Element | Requirement (Circle) | Employee Signature and Date | Trainer Signature and Date |
|---|---|---|---|---|
| | • Employee has been trained to use Identified Waste Stream Handbook | | | |
| **Inspection Procedures** | Conducting Weekly, Monthly Inspections<br>• Employee has participated in OJT implementation of each Permit required inspection | Initial<br><br>Annual Proficiency Demonstration | | |
| | Emergency Equipment<br>• Employee understands inspection requirements for alarms, showers, fire extinguishers | Initial<br><br>Annual Proficiency Demonstration | | |
| **Preparing Waste for Shipment** | Manifesting<br>• Employee has been trained to complete a Uniform Hazardous Waste Manifest<br>• Employee understands DOT required shipping papers | Initial<br><br>Annual Review in Job Briefing | | |