

PERMIT ATTACHMENT 5
TRAINING PLAN

5.0 TRAINING PLAN

5.1 Introduction

White Sands Missile Range (WSMR) personnel shall successfully complete a program of classroom instruction and/or on-the-job training to ensure compliance with state and federal hazardous waste management regulations and to operate and maintain the Hazardous Waste Storage Facility (HWSF) in a safe manner and to ensure compliance with New Mexico Hazardous Waste Regulations. Training shall comply with 20.4.1.500 NMAC, incorporating 40 CFR §264.16(a)(3) and shall fulfill the requirements of 29 CFR 1910.120.

5.2 Job Titles and Job Descriptions

5.2.1 Job Title: Hazardous Waste Program Manager

Job Description: Ensure hazardous waste is stored in compliance with Permit requirements and ultimately disposed of in accordance with state, federal, and DOD regulations and Army guidelines. This person also oversees the operation of satellite and less than 90-day accumulation areas. The Hazardous Waste Program Manager is responsible for implementing the hazardous waste management training program and shall be trained in hazardous waste management procedures as specified in 40 CFR §264.16(a)(2).

5.2.2 Job Title: Hazardous Waste Operator

Job Description: Provide technical and operations support at the HWSF and/or less than 90-day accumulation areas to ensure hazardous wastes are managed in accordance with requirements of this Permit, federal and State regulations, and Army Guidelines.

5.2.3 Job Title: Waste Generator

Job Description: Army regulation 200-1 requires that all persons handling or managing hazardous waste receive appropriate training. Waste generators create and/or handle hazardous waste or are responsible for operations that generate or handle hazardous waste. Waste Generators may operate satellite accumulation points and may transport waste containers from satellite accumulation points to less than 90-day accumulation areas, following non-public, WSMR routes.

5.3 Description of Training

5.3.1 Hazardous Waste Storage Facility Manager Training

The HWSF Manager shall be knowledgeable of Federal and State RCRA regulations and Permit conditions. This knowledge may be met through a combination of on-the-job training, classroom training, and experience and education.

5.3.2 Hazardous Waste Operator Training

Personnel assigned as Hazardous Waste Operators shall complete training to ensure their job functions are completed in compliance with Permit requirements. This training may be completed as on-the-job training (OJT), classroom training, or a combination of OJT and classroom training. Training will address the following topics:

- Physical layout of the buildings, particularly the location and use of emergency equipment and systems (i.e., how to operate alarm systems);
- Hazardous waste identification, treatment, and disposal procedures (turn-in requirements, analysis, packaging, and record keeping);

- Procedures in handling, storing, and manifesting hazardous waste;
- Inspection and corrective action techniques for potential inadequacies;
- Emergency response procedures for spills, fires, explosions, operations shutdown, evacuation; and
- Procedures for how to use and inspect facility emergency and communication equipment.

5.3.3 RCRA Waste Generator Training

This training shall include the following topics:

- Overview of Federal and State waste management regulations
- Army requirements and policies for waste management
- Procedures for handling and accumulating hazardous waste including the applicable sections of 40 CFR §262
- Inspection of accumulation areas and containers
- Transport of waste containers from Satellite Accumulation Areas to Less Than 90 Day Accumulation Areas
- Management of Universal Waste and Recyclables

5.4 Training Frequency

Training shall be completed within six months of job assignment and refresher training shall be completed annually thereafter. Facility personnel must take part in an annual review of the initial training as required by 40 CFR §264.16(c).

5.5 Personnel Assignments

No employee shall work unsupervised until he/she has completed applicable training requirements.

5.6 Training Records

Training records will include the job title and job description as listed above, the name of the employee, a description of completed training, and the completion date for training. Training records on current personnel shall be kept until closure of the facility. Training records of former personnel shall be maintained in the operating record for a minimum of 3 years.

White Sands Missile Range Inspection Sheet <90 Day Storage Facility, HWSF				
The following inspection checklist is to be completed on a weekly basis and retained onsite for all Sites.				
HWSF:		Date:		Inspector: (signature)
90-Day Site:		Time:		Inspector: (print)
No.	Item	Yes	No	Comments/Corrective Action
1.	Signs are posted for HW as required?			
2.	Is site security maintained properly (fence gaps, gates, doors, locks, etc ...)?			
3.	Is a means of communications or alarm readily available and operational? (Emergency numbers posted).			
4.	Are containers marked properly (IAW WSMR Reg. 200-1)?			
5.	Are all containers in good condition? (Free of leaks, spills, and structural defects)			
6.	Are containers kept securely closed?			
7.	Is waste compatible with container it is in?			
8.	Is secondary containment present? (For liquids only)			
9.	Are there any signs of spills?			
10.	Is spill equipment available on site? (Over pack, absorbent, PPE).			
11.	Is a log book maintained for each container recording date, type of waste, total amount of waste in the container, and the person's signature?			
12.	Are all weekly inspection records available and up to date?			
13.	Is the fire extinguisher inspection conducted monthly?			
14.	Are the ventilation systems on portable buildings operational? (Pertains to HWSF only)			
15.	Is a water source and hose available? (pertains to HWSF only)			
16.	Is there an eyewash and emergency shower available on site and is it operational?			
17.	Is the air conditioning system operating?			
18.	Were odor or fumes detected or observed prior to or upon entry?			
19.	Is the wind sock operational? (Pertains to HWSF only)			
20.	Are all containers properly located (aisle space, compatibility, grounding)?			
21.	Is the containment area in good condition (deterioration of curbs, seals)?			
22.	Is all material handling equipment operational (load test/inspection date current)?			
23.	Is a current waste stream profile available?			
Comments:				
Acknowledgement of Manager: _____ Date and Time: _____				