

DEPARTMENT OF THE ARMY  
 DEVENS RESERVE FORCES TRAINING AREA  
 Devens, MA 01434-4424  
 17 October 2005

Environmental Management  
**HAZARDOUS WASTE PERSONNEL TRAINING PLAN**

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**HISTORY.** This is the first publication of this regulation under the Devens Reserve Forces Training Area (RFTA).

**SUMMARY.** This plan provides guidelines for those personnel involved in hazardous waste management to ensure that personnel are properly trained and that work is conducted in a safe, conforming, and environmentally sound manner.

**APPLICABILITY.** This publication applies to all Devens RFTA Directorates, staff activities, and military organizations, as well as to government agencies, civilian organizations, contractors, and individuals who are training, doing business, conducting research, or otherwise using Devens RFTA facilities. It is both informative and directive in nature.

**PROPONENT AND EXCEPTION POLICY.** The Environmental Branch of Directorate of Public Works (DPW) is the proponent of this publication. The Environmental Branch has the authority to approve exceptions to this memorandum that are consistent with complying law and regulation.

**SUGGESTED IMPROVEMENTS.** Users are invited to send comments and suggested improvements on Department of the Army (DA) Form 2028 (Recommended Changes to Publications and Blank Forms) to Commander, DRFTA, ATTN: IMNE-DEV-PWE, Devens, MA 01434-4424.

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## CHAPTER 1. INTRODUCTION.

**1-1. Purpose.** This plan provides guidelines for Devens Reserve Forces Training Area (DRFTA) personnel involved in any aspect of hazardous waste handling or management. This training plan is designed to ensure that all hazardous waste personnel are suitably trained so that their work is conducted in a safe, conforming and environmentally sound manner. The training program will establish guidelines for workers in chemical or waste handling, safety procedures, waste management, processing procedures, and emergency response action as defined in references a. through g.

**1-2. Background.** DRFTA is classified as a large quantity Hazardous Waste (HW) generator. The facility maintains satellite accumulation points and 90-day storage facilities. Hazardous waste is removed by contract to off-site Resource Conservation and Recovery Act (RCRA) permitted treatment, storage or disposal facilities (TSDF). Devens Army Regulation 200-2 defines a hazardous waste worker as any person who operates or works at a Temporary Storage Area, turns in 5 gallons or more of hazardous waste, or works with a process, which produces hazardous waste or works in an area where hazardous waste may be produced. Tenant Commanders, Activity Heads and Garrison Directors are responsible for ensuring completion of training.

**1-3. Scope.** The provisions of this plan apply to the personnel and property of DRFTA. These provisions also apply to tenant activities as provided for their respective Inter-Service Support Agreements (ISSA) and Memorandum of Agreements (MOAs). DRFTA personnel who are officially involved with incidents outside of DRFTA should also follow the applicable provisions of this instruction.

a. Federal and State Requirements. Title 40 CFR 262.34(d)(5)(iii) and 265.16, Title 29 CFR 1910.120 and 310 CMR 30.516(1) require personnel who work at 90-day storage areas to be trained in the hazardous waste management practices relevant to their activity within 6 months after the date of employment or assignment. Documentation of training which includes the worker's name, training location, training date, number of training hours, and course outline must be maintained for three years.

b. Army. DA PAM 200-1 Environmental Protection and Enhancement 17 Jan 2002, Chapter 5-2 requires a HW training program which includes coverage of RCRA, the Occupational Safety and Health Administration (OSHA) and spill response training. DA PAM Chapter 5-2 requires adherence to DOD 4500.9-R Chapter 204 and DOT Regulation Title 49 CFR when transporting hazardous materials, which includes hazardous waste.

**1-4. Acronyms**

<b>Acronym</b>	<b>Term</b>
AR	Army Regulation
CFR	Code of Federal Regulation
EPA	Environmental Protection Agency
DOD	Department of Defense
DOT	Department of Transportation
HAZCOMM	Hazard Communication
HAZWOPER	Hazardous Waste Operations and Emergency Response
HW	Hazardous Waste
ISSA	Inter-Service Support Agreement
MOA	Memorandum of Agreement
MSDS	Material Safety Data Sheets
OSHA	Occupational Safety and Health Administration
RCRA	Resource Conservation and Recovery Act
TSDF	Treatment, Storage, and Disposal Facility

**CHAPTER 2. REGULATIONS.**

Regulations a. through j., listed below, establishes the mandated areas for hazardous waste operations training and related training requirements for personnel that generate, handle or supervise the handling of hazardous waste. Regulation i. provides minimum requirements for emergency response personnel. (The U.S. Army Reserve Command is preparing a comprehensive environmental training plan, which will detail all DRFTA environmental training requirements, with a particular emphasis on hazardous waste training. Contents of the formalized training program will vary according to job categories and associated levels of responsibility.)

- a. 29 CFR 1910.120
- b. 29 CFR 1910.1200
- c. 40 CFR 262
- d. 40 CFR 264
- e. 49 CFR 173
- f. 310 CMR 30.340
- g. 310 CMR 30.516
- h. AR 200-1

- i. Devens RFTA Reg 200-2
- j. Devens RFTA Reg 385-1

### **CHAPTER 3. PERSONNEL TRAINING.**

**3-1. General Instructions.** DRFTA personnel at all levels of hazardous waste management require proper training to perform their assigned duties. Appendix A contains a general listing of the EPA, DOT, and OSHA regulatory training which is required for those involved in hazardous waste management, hazardous waste transportation, hazardous chemicals workplace safety, and hazardous waste operations. The regulatory requirements for the various types of training are also included in table.

#### **3-2. Types of Hazardous Waste Training Required.**

- a. Management personnel (e.g., Commanding Officers, department heads, and first and second-line supervisors) require training to oversee and direct hazardous waste activities and disposal.
- b. First-line supervisors require training to ensure the personnel generating hazardous waste are in compliance with regulation f. and that they execute proper and timely turn-in of hazardous waste, perform inspections of their areas of responsibility, including hazardous waste accumulation areas, maintain required hazardous waste records and perform related duties.
- c. Hazardous waste management coordinators require training to recognize hazardous waste requirements which must be implemented in their areas of responsibility, coordinate hazardous waste operations within their areas and with other organizations, evaluate compliance of personnel generating hazardous waste, coordinate proper and timely turn-in of hazardous waste, perform inspections of their areas of responsibility, including hazardous waste accumulation areas, maintain required hazardous waste records, and perform related duties.
- d. Hazardous waste generators require training to properly manage generation of hazardous waste, conform to various administrative and legal requirements, properly respond during initial spill response; i.e., notify emergency personnel, and perform related duties.
- e. RCRA-permitted hazardous waste facility operators require training to ensure that facility operation fully complies with the detailed provisions of the hazardous waste permit(s), to conduct sampling, inspections and day-to-day operations, and carry out required record keeping. Hazardous waste facility operations personnel must successfully complete a program of classroom instruction or on-the-job training within six months after their date of assignment. In addition, facility personnel shall participate in an annual review and evaluation of the elements of the initial training program.

f. Drivers of vehicles transporting hazardous waste require training to ensure these wastes are properly transported and spills are properly reported, contained, and cleaned up.

g. Emergency response personnel (e.g., Fire Department, Environmental Officer) require training to properly respond to hazardous waste incidents requiring implementation of reference h.

**3-3. HAZCOMM Training.** Personnel who are occupationally exposed to hazardous chemicals require training to ensure they understand the hazards of the chemicals they work with and learn how to minimize those hazards. Additional guidance can be found in Devens RFTA Reg 385-1. In accordance with regulation b., this training often referred to, as “HAZCOMM training” shall include, at a minimum, the following elements:

- a. The Hazard Communication Standard.
- b. Methods used to detect the presence or release of a hazardous chemical in the workplace.
- c. How to obtain and use MSDSs.
- d. How to protect personnel from chemical hazards.
- e. In accordance with regulation b., training must be provided at the time of first job assignment, before a new hazard is introduced to the work area, and when the job assignment is changed.

**3-4. All Personnel Training.** Personnel at all levels of hazardous waste management require proper training to perform their assigned duties. In accordance with regulation g., training shall include, at a minimum, the following elements:

- a. Proper use of personnel spill and safety equipment.
- b. Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment.
- c. Key parameters for waste feed cut-off systems.
- d. Communications or alarm systems.
- e. Response to fires or explosions.
- f. Response to groundwater contamination incidents.
- g. Shutdown of operations.

**3-5. Types of Hazardous Waste Operations and Emergency Response.** The following is a summary of the types of Hazardous Waste Operations and Emergency Response (HAZWOPER)

training required by regulation a. for personnel involved in emergency response operations for releases, or substantial threats of releases of hazardous substances.

a. **First Responder Awareness Level.** Individuals who are likely to witness or discover a hazardous substance release and who have been trained to initiate an emergency response sequence by notifying the proper authorities of the release. First responders at the awareness level take no further action beyond notifying the authorities of the release. Sufficient training or experience to demonstrate competency in specific areas identified in 29 CFR 1910.120 (q)(6)(i) is required. The duration of training is generally 4 hours.

b. **First Responder Operations Level.** Individuals who respond to releases or potential releases of hazardous substances as part of the initial response to the site for the purposes of protecting nearby persons, property, or the environment from the effects of the release. First responders at the operations level are trained to respond in a defensive fashion without actually trying to stop the release. Their function is to contain the release from a safe distance, keep it from spreading, and prevent exposures. Training must be at least 8 hours or sufficient evidence of training or experience to demonstrate competency in specific areas identified in 29 CFR 1910.120 (q)(6)(ii) is required.

c. **Hazardous Materials Technician.** This is a category of individuals who respond to releases or potential releases for the purpose of stopping the release. Hazardous materials technicians assume a more aggressive role than a first responder at the operations level in that they will approach the point of release in order to plug, patch, or otherwise stop the release of a hazardous substance. Hazardous materials technicians shall have received at least 24 hours of training equal to the first responder operations level, and in addition, have competency in specific areas identified in 29 CFR 1910.120 (q)(6)(iii).

d. **Hazardous Materials Specialists.** This is a category of individuals who respond with and provide support to hazardous materials technicians. The hazardous materials specialist's duties parallel those of the hazardous materials technician, but require a more directed or specific knowledge of various substances they may be called upon to contain. A hazardous materials specialist also acts as the site liaison with Federal, state, local and other government authorities in regards to site activities. Hazardous materials specialists shall have received at least 24 hours of training equal to the technician level, and in addition, have competency in specific areas identified in 29 CFR 1910.120 (q)(6)(iv).

e. **On-Scene Incident Commander.** Incident commanders, who will assume control of the incident scene beyond the first responder awareness level, shall receive at least 24 hours of training equal to the first responder operations level, and in addition, have competency in specific areas identified in 29 CFR 1910.120 (q)(6)(v).

Personnel involved in clean-up operations involving hazardous substances that are conducted at uncontrolled hazardous waste sites, i.e., areas where an accumulation of hazardous waste creates a threat to the health and safety of individuals, or the environment, or both, require specific training meeting the requirements of 29 CFR 1910.120 (e). General site workers, such as equipment operators, general laborers, and on-site management and supervisory personnel,

engaged in hazardous substance removal or other activities which expose or potentially expose workers to hazardous substances and health hazards shall receive a minimum of 40 hours of instruction off the site, and a minimum of three days actual field experience under the direct supervision of a trained, experienced supervisor.

## **CHAPTER 4. RESPONSIBILITIES.**

### **4-1. Devens Directorate of Public Works.**

- a. Assist shops, offices, and departments as required in the preparation of training plans, outlines, and bulletins for hazardous waste training.
- b. Recommend and review the content of hazardous waste training programs.

### **4-2. Department/Office/Shop Heads.**

- a. Ensure managers/supervisors budget for hazardous waste training using qualified instructors, lesson plans, syllabuses, outlines and bulletins.
- b. Ensure employees receive required training, which may include classroom and/or on-the-job training.
- c. Ensure all training is appropriately documented in official employee training records. This documentation will include topic, date(s) attended, number of course hours, signature of attendees, social security number, and shop/department/office. Appendix B or an equivalent record can be used for documenting the training.

**4-3. Tenants.** Adopt internal procedures consistent with those of this plan and regulations a. through g.

### **4-4. Contracting Officers.**

- a. Ensure by review of customer generated Statement of Work that specifications include necessary documentation to direct oversight that DRFTA contractors generating or handling hazardous waste within the installation have all required hazardous waste training, as required by regulations a. through j.
- b. Contracting officers should also ensure that contractors have “fully read” the HWMP and will comply with a. through j. prior to starting work at DRFTA.

### **4-5. Department/Office/Shop Hazardous Waste Management Coordinators.**

- a. Assist in the preparation of lesson plans, outlines, and bulletin for hazardous waste training, as requested.



- b. Assist qualified shop instructors to train installation workers, as requested.

**4-6. Supervisors.** Ensure that only personnel appropriately trained, in accordance with the requirements of this appendix, are assigned to jobs requiring handling of hazardous waste.

## **CHAPTER 5. RECORDKEEPING.**


**5-1. RCRA-permitted Hazardous Waste.** Regulation g. requires RCRA-permitted hazardous waste facility management personnel to maintain the following documents and records at the hazardous waste storage facility:

- a. Job title for each position related to hazardous waste management and the name of the employee holding each position.
- b. A written job description for each position listed above including education, qualifications, and/or duties assigned to each position.
- c. A written description of the type and amount of both introductory and continuing training given to each person filling a position listed under item 1.
- d. Records that document the training or job experience required has been given to and completed by facility personnel. The course name, date, and hours of training shall be provided for each employee. Appendix B or an equivalent record can be used for documenting the training.

**5-2. Hazardous Waste Training Documentation.** All hazardous waste training shall be documented for inclusion in official employee training files. This document will include the topic, date(s) attended, number of course hours, name of employee, social security number, and shop/department/office.

**5-3. Training Records Retention.** Training records on all current personnel must be kept until closure of the facility. Training records on former employees must be kept for at least three years from the date the employee last worked at that facility.

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**Appendix A. TRAINING PERSONS AND REGULATORY REQUIREMENTS**

Person	Includes	Training Subject	Training Criteria	Updates	Reg. Ref.
<b>EPA - RCRA - Hazardous Waste Management</b>					
Large Quantity Generator or TSDF "Personnel"	Anyone who could cause non-compliance at the facility	Duties which ensure the facility's compliance with EPA rules	Established by the generator in a written training plan	Annual review of initial training	40 CFR 262.34 (a)(4), 264.16, & 265.16
Small Quantity Generator	Employees involved in waste handling and emergency response.	Duties which ensure the facility's compliance with EPA rules	Established by the generator (no written plan)	No specific updates	40 CFR 262.34 (d)(5)(iii)
<b>DOT - HMTA - HAZARDOUS Materials Transportation</b>					
"Hazmat Employees"	Employees who directly affect transportation safety	Compliance with DOT rules and safety	Determined, tested and certified by the employer	Repeated at least every three years; train in rule changes as they occur.	49 CFR 172.700; 173.1(b)
Motor Carrier Drivers	Hazmat employee who will operate a motor vehicle	Vehicle inspection, operation, attendance, loading and unloading, etc.	As required by 49 CFR 171, and 49 CFR 383-399	Repeated at least every three years; training rule changes as they occur.	49 CFR 172.700 and 177.816
<b>OSHA - HazCom - Hazardous Chemicals Workplace Safety</b>					
Employee	Any employee who could be exposed to any physical or health hazard	Recognition of and protection from hazards, the hazard communication program per se	Established in written hazard communication program	When new hazard is introduced to the workplace	29 CFR 1910.1200(h)
<b>OSHA - HAZWOPER - Certain Hazardous Waste Operations</b>					

Cleanup Site Employee	Employees who may be exposed to hazards at cleanup sites, and their supervisors	Hazards, hazard protection, medical surveillance and the site safety plan	Specified as minimum time (e.g., 40 hours for general site workers); some specific content	8 hours annual refresher	29 CFR 1910.120(e)
TSDF Site Employee	Employees exposed to health hazards or hazardous substances at TSDF sites	To enable employees to perform their assigned duties in a safe and healthful manner	Specified as minimum time (e.g., 24 hours for general site employees)	8 hours annual refresher	29 CFR 1910.120(p)(7)
Emergency Responder	Employees who respond to emergencies other than regulated above	Understand hazards, recognize emergencies, response actions, etc.	Both content and minimum time specified	Annual refresher	29 CFR 1910.120(q)(4)-(8)

