

**FORT WINGATE DEPOT ACTIVITY  
GALLUP, NEW MEXICO**

**HAZARDOUS WASTE  
MANAGEMENT PROGRAM  
TRAINING PLAN**

**6 June 2003**

TRAINING PLAN  
FOR  
FT WINGATE DEPOT ACTIVITY (FWDA)  
HAZARDOUS WASTE MANAGEMENT PROGRAM

A. GENERAL

1. SCOPE AND APPLICATION. Employees must successfully complete training in hazardous waste management procedures within six (6) months after the date of appointment to this type of position and will not work in unsupervised situations until these training requirements are met. Personnel must also participate in an annual review of this training.

Employees involved in the management, of hazardous waste at FWDA's RCRA regulated or permitted facilities, including those on temporary appointments, are required to participate. The types of duties FWDA employees may engage in when managing hazardous waste includes, but is not necessarily limited to; coordination, engineering, technical work, transportation, identification, record keeping, and emergency response.

Hazardous waste handling and treatment at the FWDA OB/OD Area will be accomplished through organizations contracted by the Army to perform this type of work. Contractors working at the FWDA OB/OD Area will require OSHA Hazardous Waste Operations (HAZWOPER) training, and will perform their work in accordance with site specific work plans and Health and Safety plans. Contractors retained by the Army are responsible to provide competent and knowledgeable workers pertinent to the specific task(s) or operations that they are hired to perform. As such, the contractor organization has the responsibility to train their employees to perform their specific job duties, and is not considered to be part of the FWDA hazardous waste management training program.

Contractor employees will be required to attend a FWDA hazardous waste training session to be instructed on site-specific emergency response procedures, and any potential fire, explosion, health, safety or other hazards of the hazardous waste operation.

B. PROGRAM ADMINISTRATION.

1. The Chief of the Tooele Army Depot (TEAD) Environmental Office directs FWDA's hazardous waste management training program. The Chief of the TEAD Environmental Office reviews and approves the content, method of presentation, and evaluation techniques for all courses developed in support of FWDA's hazardous waste management training program. The TEAD Environmental Office Chief will meet stringent

standards that take into consideration educational degrees, professional certifications, schools/training, work history and knowledge of assigned area of instruction.

2. Training instructors must be a subject matter expert in the area of Hazardous Waste Management and receive instructor training courses that will assist them in developing the skills and confidence needed to provide effective classroom instruction.
3. RECORD KEEPING/REPORTS/DOCUMENTATION. FWDA employees whose duties directly involve the management of hazardous waste must successfully complete a program of classroom instruction that teaches them to perform their duties in a way that ensures that FWDA will be in compliance with the requirements of 40 CFR Part 264.16. Contractors retained to perform work at the FWDA OB/OD Area will be required to successfully complete the same classroom instruction to familiarize them with site-specific emergency procedures, hazards, and hazardous waste management requirements. Attendance at courses is documented on SDSTE Form 2822, Installation Training-Attendance and Rating Record. Exams which evaluate the students knowledge of the material are administered and maintained as documentation along with the applicable SDSTE Form 2822 at FWDA.

Documentation is further aided by a computer database that generates various reports. Information in these reports is maintained on a database in the TEAD Environmental Office and is generated to aid in identifying members of the FWDA Hazardous Waste Management Program. They contain such things as employee names, social security numbers, organizations, job numbers, course, date of initial training and when refresher course is due.

4. CERTIFICATES. Employees and contractors that have received and successfully completed the initial training course will be certified by their instructor as having completed the necessary training. Certificates or other form of documentation (i.e., DD Form 1556) will be given to each person who successfully completes a course by the course provider.
5. COURSE OUTLINE and TRAINING PLAN. An outline of the FWDA Hazardous Waste Management course is contained in Appendix 1. The content of the training plan and course description in its entirety is on file at the TEAD Environmental Office.
6. JOB DESCRIPTION. The job descriptions of FWDA employees who are members of the FWDA Hazardous Waste Management Training Program will include the following statement:

“Performs hazardous waste management duties and/or hazardous waste worker duties in permitted or regulated facilities. Duties may involve one or more of the following: management, coordination, engineering, or technical work involving hazardous waste management programs or projects; or movement, containerization, storage, identification, record keeping, emergency response, treatment, and/or disposition of hazardous waste. Such duties require the ability to interpret and implement environmental regulations, knowledge of hazardous waste products and safety regulations, and the skill to affect regulatory requirements and ensure proper management and/or handling of hazardous wastes. Incumbent must successfully complete training in hazardous waste management procedures within six (6) months after the date of appointment to this position and will not work in unsupervised situations until these training requirements have been met. Incumbent must also participate in an annual review of this training.”

Job descriptions by job titles and job numbers for FWDA employees who are hazardous waste management personnel are maintained and available for review at FWDA.

Job descriptions for contractors performing work at the FWDA OB/OD Area will not be maintained as part of the FWDA training records file.

## APPENDIX 1

### COURSE OUTLINE

#### COURSE TITLE: FWDA HAZARDOUS WASTE MANAGEMENT COURSE

- 1.0 Introduction
  - 1.1 Objectives
  - 1.2 Commanders Responsibilities
  - 1.3 Duties of the TEAD Environmental Office
  - 1.4 Duties of the FWDA Caretakers
  - 1.5 Duties of Contractors
- 2.0 Key Regulations that Affect Hazardous Waste Management
- 3.0 What is a Hazardous Waste?
  - 1.1 Characteristic Hazardous Waste
  - 1.2 Listed Waste
  - 1.3 Waste Streams Common to FWDA and Handling Requirements
    - 1.3.1 OB/OD Grounds – Waste Military Munitions
- 4.0 Hazardous Waste Handling Requirements
  - 4.1 Containerizing Hazardous Waste
  - 4.2 Labeling Waste Container
  - 4.3 Satellite Accumulation Site
  - 4.4 90-day Storage Site
  - 4.5 Typical Flow of Hazardous Waste
- 5.0 OB/OD Operating Requirements
  - 5.1 Permit Requirements
  - 5.2 Inspection Requirements
- 6.0 Record keeping Requirements
  - 6.1 Inspection Records
  - 6.2 Training Records
  - 6.3 Operating Records
- 7.0 Emergency Preparedness and Contingency Plans and Procedures
  - 7.1 Emergency Response Procedures
  - 7.2 Emergency Equipment
  - 7.3 Communications and/or Alarm System