

## Chapter X Training

### .1 A. GENERAL.

1. The DRMS Corporate Training Plan <http://www.drms.dla.mil/drms/internal/General/Training/training.html> fulfills regulatory requirements for environmental training and provides the knowledge and skills to enable employees to perform their jobs in an environmentally safe manner. Employees (except DRMS-LH and DRMSI-H employees) involved in the managing or handling of hazardous material and/or hazardous waste, including those on temporary appointments, are required to participate.

There may be some cases where an employee handles hazardous property, and whose job series is not listed in the Plan. In those cases, the DRMO Chief must evaluate the employee's duties and schedule the employee for the appropriate courses.

2. Site-specific training requirements are the responsibility of the DRMO Chief.

### .2 B. REGULATORY REQUIREMENTS.

All mandatory compliance courses required by DRMS that meet RCRA/OSHA/DoT requirements are in the DRMS Corporate Training Plan.

1. **The Resource Conservation and Recovery Act (RCRA)** sets standards for generators and for owners and operators of hazardous waste treatment, storage and disposal facilities in the U.S. and its territories. These standards require that facility personnel complete an initial program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance. The 40 hour initial training requirement is satisfied by taking the DRMS course, RCRA Facility Com-

pliance. After the initial training, refresher training is required annually.

a. Overseas employees may attend DoD sponsored courses in the Final Governing Standard (FGS) in lieu of RCRA Facility Compliance.

b. Overseas local national employees may take a locally offered course on hazardous waste facility management regulations and practices in the host nation language, with prior approval from DRMSI-H.

2. **The Occupational Safety and Health Administration (OSHA)** sets the following standards for the safety and health of employees:

a. **Hazardous Waste Operations** (29 CFR Part 1910.120).

**NOTE:** *Employees going inside the exclusion area at third party sites must have 40 hours of OSHA required training prior to going into the exclusion area. Employees that enter these areas must also have 8 hours of annual OSHA refresher training.*

b. **Emergency Response** (29 CFR Part 1910.120).

c. **Hazard Communication Standard** (29 CFR Part 1910.1200).

3. **The Department of Transportation (DOT)** requires that shippers ensure that all HM/HW is classified and described on a shipping paper. After the initial training, 8 hours of refresher training is required every 2 years.

a. Overseas employees may attend Transportation of Dangerous Goods courses in lieu of the Transportation of HM/HW for DoD, with prior approval from DRMSI-H.

### **.3 C. APPOINTMENTS.**

#### **Contracting Officer's Representatives (COR).**

The COR appointment requires training to complete COR duties in compliance with all regulations. The mandatory training for CONUS CORs is in the DRMS Corporate Training Plan. CORs for OCONUS must complete "Safety and Health for Handlers of HM/HW", "RCRA Facility Training" and other training as specified by the Contracting Office. CORs will not accompany contractors that are opening containers until they have successfully completed the safety course, designated in the DRMS Corporate Training Plan, and have appropriate personal protective clothing and equipment.

**NOTE:** Respiratory protection training is **NOT** provided in the DRMS offered Safety and Health for Handlers of HM/HW course. It must be obtained from the host or other source, if required. Level D clean-up will not require the use of respirators.

### **.4 D. RECORDKEEPING.**

40 CFR 264.16 and 265.16 require DRMS to maintain records that document the training or job experience that has been given to and completed by DRMS personnel. The following documents must be maintained by the CONUS DRMO to meet this requirement:

1. A copy of the training certificate; or,
2. A copy of the DD Form 1556 (copy 9) with the privacy act information blackened out; and,
3. A copy of the course outline.
4. If On-the-Job (OJT) is performed, a DRMS Form 43 should be filed in the training record.

**NOTE:** Environmental record keeping procedures are also discussed in Chapter IV, paragraph U.

### **.5 E. COURSE STANDARDS.**

Students must pass all required courses. To pass, a minimum score of 70 must be attained on the final examination. If a student receives a score of

69 or below in any course, DRMS-LH or DRMSI-H and the DRMO will be notified by letter. The student will be given assistance in the problem area(s). The Zone Manager and DRMO Chief will then have the option of the student re-taking the course, re-taking the test at the student's work site, or taking other appropriate action.

### **.6 F. PROCEDURES.**

#### **1. Zone Managers will:**

a. Monitor environmental and related safety training to ensure that mandatory training prescribed in the DRMS Corporate Training Plan is accomplished. Supervisors will ensure that Individual Development Plans (IDPs) reflect mandatory and other hazardous property training requirements.

b. Ensure that any additional training requirements contained in specific country, state and local laws and regulations are fulfilled.

#### **2. DRMOs will:**

a. Initiate a training request (DD Form 1556) for each attendee at least 60 days prior to course start date.

b. Forward training request (DD Form 1556) to DRMS-TM for approval.

c. After notification that the employee has been given a space in the course, make travel arrangements.

#### **3. DRMS-TM will:**

a. Allocate training spaces.

b. Notify employee when they have been allocated a training space. If unable to schedule employee for the session requested, reschedule employee for later session.

c. Forward copies of the training request (DD Form 1556) to the DLA Training Center.

#### **4. DLA Training Center will:**

- a. Allocate spaces to generating activities, if session will not be filled by DRMS employees.
- b. Develop a class roster and provide to the instructor.
- c. Verify class attendance to ensure students are present and in the right class.

### **.7 G. OSHA/RCRA ANNUAL REFRESHER HAZARDOUS WASTE OPERATIONS TRAINING.**

1. Environmental and safety training is mandatory for all employees involved in the handling or management of hazardous property. All employees that have completed RCRA and OSHA training must receive refresher training annually to meet 40 CFR 264.16/265.16 and 29 CFR 1910.120.
2. Refresher training will be scheduled and taught by certified DRMS instructors.
3. To be a certified instructor for the refresher training the employee must meet the following criteria:
  - a. Be equally knowledgeable and understand the:
    - OSHA and RCRA compliance requirements.
    - OSHA Hazard Communication Program and the Hazardous Waste Workers Requirements.
  - b. Have completed, as a minimum, the DRMS courses, “Safety and Health for Handlers of HM/HW” and “RCRA Facility Compliance”.
  - c. Be selected by the Zone Manager to attend the “OSHA/RCRA Annual Refresher Train-the-Trainer” course. Successful completion of the OSHA/RCRA Train-the-Trainer course qualifies the employee to be certified as an instructor for the course. DRMS instructors must attend annual OSHA/RCRA training through the DLA Training Center to maintain their certification.
5. OSHA refresher training must be a minimum of 8 hours in length.

6. Students will complete a course evaluation that is provided in the text. After each session, the instructor and the DRMO Chief will review the evaluations, then forwarded the evaluations and rosters to DRMS-TM.

### **.8 H. HAZARDOUS PROPERTY TRANSPORTATION REFRESHER TRAINING.**

Refresher training is mandatory for personnel who release or issue hazardous property. Employees who have completed “Transportation of Hazardous Material/Hazardous Waste (HM/HW) for DoD”, or an equivalent course, must receive refresher training every 2 years to meet DoD requirements.

### **.9 I. CERTIFICATION.**

1. Employees that have completed Safety and Health for Handlers of HM/HW, Transportation of HM/HW for DoD, and RCRA Facility Compliance Training and site-specific requirements, the DRMO Chief will sign a confirmation letter and forward it, through International or National Commands (see Enclosure 1). International or National Command will then forward to DRMS-LH.
2. When DRMS-LH receives the confirmation letter, a certificate will be issued to the employee (see Enclosure 2).

### **.10 J. ALTERNATE TRAINING.**

Employees seeking alternate training (or a locally offered course), intended as a substitute for mandated environmental/safety training must adhere to the following requirements:

- a. A letter requesting the alternate training should be submitted to DRMS-LH or DRMSI-H. Included with the request must be a copy of the course outline, syllabus, cost of the course, and the name and telephone number of the provider.
- b. DRMS-LH or DRMSI-H will send a return letter to the requesting office regarding the

approval or disapproval. A copy must be maintained in the environmental training records.

c. If the DRMO is operating under a RCRA Part B permit the DRMO must contact the state agency, only after receipt of the approval from DRMS-LH, for approval to waive the training section in the permit. The DRMO must document approval from the state agency. The state approval, and the DRMS approval, must be maintained in the environmental training records.