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## Environmental Training Plan

A. ARDEC Regulation 350-3, Training/Certification Requirements for Hazardous Operations dictates the policy, responsibilities and procedures for obtaining mandatory training in accordance with 29 CFR 1910, 49 CFR 172, 40 CFR 264.16, and AR 200-1. Sections of all of these regulations are applicable to personnel involved in the various hazardous waste operations conducted at Picatinny Arsenal. Employees are responsible to attend all hazardous operations training which is required for their jobs. The federal regulation, 40 CFR 264.16 requires that facility personnel successfully complete a 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 with the requirements of hazardous waste regulations. AR 200-1 establishes the installation hazardous waste management policy which includes training requirements for hazardous waste handlers. In conjunction with these regulations, the Environmental Affairs Office offers training semi-annually to all hazardous waste personnel, utilizing this and other regulations/policies as a training aid. The federal regulation 29 CFR 1910 requires additional training for personnel involved in emergency response, employees required to wear respiratory protection, and supervisors overseeing such operations. The federal regulation 49 CFR 172 requires specific types of training for personnel involved in transportation of hazardous materials. This includes all personnel involved in the preparing the paperwork for such transport and DOT Security requirements. Personnel are also required by regulations as set forth in N.J.A.C 7:1E and 40 CFR 112, to be trained in requirements of the Spill Control and Compensation Act.

B. The following chart shows a breakout of the current environmental training that various organizations at the installation receive depending on their job responsibilities.

<b>Training Description</b>	<b>Requirement</b>	<b>Effected Personnel</b>
HAZMAT Emergency Response	29 CFR 1910	Spill Response Team
DOT Transportation	49 CFR 172	Transporter/Manifest signers
Hazardous Waste Management	40 CFR 264.16	Supervisors/Environmental Affairs Personnel/Environmental Officers
In-house RCRA Training	40 CFR 264.16	All Hazardous Waste Handlers
Awareness Training	29 CFR 1910	Security personnel
SPCC/DPCC Training	40 CFR 112	All SPCC/DPCC operations
Lead Abatement Training	29 CFR 1910	All Lead Workers
Asbestos Abatement	29 CFR 1910	All Asbestos Workers
Stormwater Training	General Permit	All Permitted facilities
Pesticide Training	AR 720-76	All Applicators
EMS Awareness	ISO Standard	All Installation personnel

C. All operators are also currently given on-site training on their program specific management plans. This training is given usually during inspections and is media specific for the current operation.

D. Currently the Environmental Affairs Office has an environmental awareness training tape for the entire workforce. This training video will demonstrate to the employees how incorporating proper EMS into everyday activities at the installation will improve processes. Special emphasis will be put on pollution prevention, obtaining proper permits and approvals prior to starting construction projects, and use of several current informational databases for environmental impacts of current operations. Additionally members of the Environmental Staff have taken EMS Auditor training, and select Environmental Officers are required as well.

E. The Environmental Affairs staff is encouraged to maintain proficiency in their specific programs in which they manage. All members of the staff have attended an initial 40 hour Environmental Spill Response training course. Environmental Officers and staff also attend on a recurring basis 24 hour program specific training. Vendors which are used usually include Cook College, Rutgers University, McCoys & Associates and Lion Technology, as well as Army specific training.

