

**CLARIFICATION NUMBER CAO-00-067, REV. 0**  
**DEFINITION OF EQUIVALENT TRAINING**  
**(TABLE B3-10)**

**ISSUE**

1. For the purposes of compliance with Table B3-10 of the WAP, what constitutes equivalent experience?
2. Is the degree requirement limited to a particular field (i.e. a B.S. in Chemistry)?

**CONCLUSION**

1. Substitution of experience in lieu of education must be consistent with standard regulatory practices, site-specific policy, and federal personnel qualification guidelines.. TRU sites should follow local policy. The local policy must be in writing and derived from a source above the Project Management Level. The source may be the local DOE Human Resources Office, applicable corporate Policy, or contractual language. If a documented policy does not exist, then CAO will use the Federal Office of Personnel Management (OPM) policy.
2. Typically, the requirement is satisfied with a technical degree in chemistry or a related field.

**DISCUSSION**

1. Information from DOE policy, EPA guidance and OSHA regulations have been consulted regarding this issue. Each is summarized below.

DOE Policy

Federal Policy

The DOE Manual for Qualification Standards for General Schedule Professional and Scientific Positions states that substitution of experience for education is rarely allowed for professional and scientific positions. When such allowances are made, the substitutable experience is couched in terms of an apprenticeship program, a professional registration/certification/qualification (i.e., PE, CIH, EIT, registered surveyor), or a documented combination of education, training, and directly applicable experience that is substantially equivalent in type, scope, and thoroughness to a full 4-year accredited professional engineering or scientific curriculum.

Additionally, where the permit specifies both education and experience requirements, any experience used to meet the permit

experience requirement may not also be used as experience substituted in lieu of education. The requirements are additive.

Examples:

1. A GC/MS Operator with a BS degree in chemistry would need “one year of independent spectral interpretation or demonstrated expertise” to meet the permit requirements.

2. A GC/MS Operator with a two-year associate degree in chemistry would need two years of substitutable GC/MS Operator experience to meet the education requirement. An additional (3<sup>rd</sup>) year of “independent spectral interpretation or demonstrated expertise” would be needed to meet the permit requirement for experience.

3. A GC/MS Operator with a high-school diploma would need four years of substitutable GC/MS Operator experience to meet the education requirement. An additional (5<sup>th</sup>) year of “independent spectral interpretation or demonstrated expertise” would be needed to meet the permit requirement for experience.

Local Policy

If the site has a local policy that addresses the substitution of relevant experience for education, either as a local DOE policy or as a contractual agreement, the local policy should be used. The local policy will be the focus of the audit program in this area.

### EPA Guidance

There is little specific guidance in the RCRA program with regard to training. Section 2.7 of Chapter 1 of SW-846 states the following:

The management of the participating field or laboratory organization should establish personnel qualifications and training requirements for the project. Each person participating in the project should have the education, training, technical knowledge, and experience, or a combination thereof, to enable that individual to perform assigned functions. Training should be provided for each staff member as necessary to perform their functions properly. Personnel qualifications should be documented in terms of education, experience, and training, and periodically reviewed to ensure adequacy to current responsibilities.

### OSHA Regulation

In addition, OSHA, at 29CFR1910.120(e)(9) defines equivalent

training for workers at a hazardous waste site as follows:

Equivalent training. Employers who can show by documentation or certification that an employee's work experience and/or training has resulted in training equivalent to that training required in paragraphs (e)(1) through (e)(4) of this section shall not be required to provide the initial training requirements of those paragraphs to such employees and shall provide a copy of the certification or documentation to the employee upon request. However, certified employees or employees with equivalent training new to a site shall receive appropriate, site specific training before site entry and have appropriate supervised field experience at the new site. Equivalent training includes any academic training or the training that existing employees might have already received from actual hazardous waste site experience.

2. The B.S. degree should be in chemistry or similar discipline (e.g., geochemistry or chemical engineering). The site project manager has the responsibility for determining if a degree is "equivalent". Determinations are on a case-by-case basis. That is, no blanket statements in procedures to cover all situations. Such determinations are to be documented.