

# Compliance officers steer through environmental thicket

Bryan Kidder, FH

The protection of people and the environment is at the heart of Hanford cleanup. To remain focused on that mission, facilities and services within the Fluor Hanford team have environmental compliance officers to guide their actions within the conditions of very complex environmental regulations.

To learn more about the role of the environmental compliance officer, or ECO, I spoke with Brett Barnes of T Plant in the Fluor Hanford Waste Management Project. Brett started at Hanford in 1989 and was one of the first in the old Environmental Services organization with a degree in environmental science.

As ECO at T Plant, Barnes reports to Bob Barmettlor, T Plant facility manager. "Our facility is preparing to accept K Basins sludge while moving forward with other work," said Barmettlor. "While protecting our environment is the duty of all of us, I need an ECO to focus T Plant personnel on compliance issues so we stay on course."



**Laura Johnson and Brett Barnes review the contents of a drum containing bulbs for recycling. As environmental compliance officer, Barnes is involved with the site-generated waste at T Plant. Johnson is a nuclear chemical operator at the plant.**

## Keeping us legal

Barnes said he makes sure the facility's permit conditions, regulations and other requirements are met by weaving them into procedures. "I follow up on this by observing activities to see that they are being properly implemented. I also interface with the regulatory agencies during inspections and audits."

These visits give the regulators an opportunity to evaluate how facilities at T Plant comply with permits and regulations. The rules spelled out in the Clean Air and Clean Water acts as well as the Resource Conservation and Recovery Act provide the backbone of environmental protection in the United States.

Because of Barnes' knowledge of T Plant permit conditions and regulations, he gives technical advice to maintenance, radcon, engineering and other organizations through administrative controls or position papers.

When something unusual comes up at the facility, ECO Barnes is one of the first to be called. "In the operation of a 60-year-old plant, you encounter unexpected challenges," Barnes said. "We recognize that possibility, so when things happen, we devise environmentally compliant pathways to move forward."

## Regulatory tangle

A good example of this is the preparation of T Plant for the storage of K Basins sludge. The sludge has been designated as a remote-handled transuranic waste that must also comply with the Toxic Substances Control Act. This is because the waste contains small levels of polychlorinated biphenyls, or PCBs.

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The storage of K Basin sludge in accordance with the Toxic Substances Control Act requires adequate floor, roof, walls and containment capability for two times the internal volume of the largest PCB container, or 25 percent of the total volume, whichever is greater. These requirements were passed on to designers through input from the facility ECO.

Selected 221-T Canyon process cells will be retrofitted to become compliant for the storage of K Basins sludge in accordance with these requirements. This effort involved discussions with regulatory agencies, members of the Sludge Handling System Project team, T Plant personnel and designers.

### Juggling priorities

Barnes said it's a challenge to put enough time into the work, given the many different things going on simultaneously. Even with that, compliance remains the top priority.

When he needs help, Barnes and the other ECOs call on the Environment and Regulation Group within Fluor Hanford. This organization takes the lead in permit writing and the deeper regulatory issues that affect the entire site. Barnes also seeks the help of Larry Kamburg of Fluor Hanford when it comes to issues involving chemical management and radioactive and toxic air emissions.

Permit conditions at T Plant go beyond the materials in the canyon or storage tanks. Barnes' role as ECO also involves him in the proper packaging, treatment and storage of wastes generated during normal operations or from various other projects. Every battery and bulb must be properly labeled and containerized for eventual shipment to the 400 Area Recycling Center.

The job of environmental compliance officer at T Plant involves day-to-day responsibility for compliance activities. When the unusual situation arises and protection of workers or the environment is in question, the ECO is an excellent source of direction.

T Plant facility manager Barmettlor relies heavily on his ECO. "Brett is our library when it comes to staying in compliance," Barmettlor said. "The rules are far too complex and ever-changing to understand without the help of our facility environmental compliance officer." ♦

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<b>Fluor Hanford</b> Editorial office: B3-30, 376-4639, fax 376-5704 Craig Kuhlman, manager of Communications Dennis Cresswell, editor Cornelia Brim, associate editor Sally Green, designer		<b>Deadline is 10 a.m. Thursday, 10 days prior to Monday publication. All articles are subject to editing. Consult with the Reach staff before ordering photos. Contact the editors by phone, fax, site mail or e-mail.</b>
<b>Bechtel Hanford, Inc.</b> Sue Kuntz, H0-09, 375-4673, fax 372-9115		
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