

HAZARDOUS WASTE COMPLIANCE PROGRAM PLAN

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ABSTRACT

The Hazardous Waste Compliance Program Plan (HWCPP) describes how the Rocky Flats Plant institutes a more effective waste management program designed to achieve and maintain strict adherence to the Resource Conservation and Recovery Act (RCRA) requirements. Emphasis is given to improve integration of line operations with programmatic and functional support activities necessary to achieve physical compliance to RCRA regulated equipment, facilities and operations at the floor level. This program focuses on specific activities occurring or which need to occur within buildings containing RCRA regulated units and activities. The plan describes a new approach to achieving and maintaining compliance. This approach concentrates authority and accountability for compliance with the line operating personnel, with support provided from the programmatic functions. This approach requires a higher degree of integration and coordination between operating and program support organizations. The principal changes in emphases are; 1) increased line operations involvement, knowledge and accountability in compliance activities, 2) improved management systems to identify, correct and/or avoid deficiencies and 3) enhanced management attention and employee awareness of compliance related matters.

EG&G Rocky Flats, Inc. (EG&G) received a Notice of Violation (NOV) from the Colorado Department of Health (CDH) on June 17, 1992, for alleged violations of the provisions of RCRA.

As part of the ensuing settlement agreement, EG&G prepared the HWCPP to guide activities necessary to correct known RCRA deficiencies and establish systems to preclude their future occurrence.

This plan and its attendant activities are part of a proactive effort by EG&G to implement a plantwide program to achieve sustained compliance with environmental statutes.

The HWCPP outlines major tasks

necessary to achieve and maintain compliance with the RCRA requirements, explains how these tasks are broadly interrelated, and presents an approach for implementation toward meeting RCRA compliance objectives.

The programs' intent is to summarize actions underway and identify future systems and processes needed to create a fully mature and effective hazardous waste compliance program.

The HWCPP is not intended to serve as the tactical implementation document describing day-to-day activities, routine milestones, or individual corrective actions necessary to remediate all specific identified deficiencies.

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Such information is found in existing work packages, compliance agreements, consent orders and associated documents, and in our Plant Action Tracking System (PATS).

Emphasis is given in the HWCPP to improved integration of line operations with programmatic and functional support activities necessary to achieve physical compliance of RCRA regulated equipment, facilities and operations at the floor level.

As a consequence, this plan focuses on specific activities occurring or which need to occur within buildings containing RCRA regulated units and activities.

The utility of this plan is that as systemic deficiencies are found that affect RCRA compliance, these deficiencies will be described and incorporated into the plan on an ongoing basis.

This will then allow the Program Manager for the HWCPP to work with affected parties to develop appropriate corrective actions, assign responsibilities for corrective actions, seek and assist in obtaining funding, and monitor implementation of corrective actions.

For purpose of the HWCPP, deficiencies are of two types; 1) identified non-compliances to a specific RCRA requirements and 2) programmatic weaknesses that may not be indexed directly to a specific requirement but represent an improvement that when implemented will facilitate the plant's ability to maintain compliance.

In regards to funding decisions and scheduling of resource allocations, non-compliant situations take priority over areas of programmatic weakness. Correction of both types of deficiencies is important and efforts will be made to obtain adequate resources to accomplish this.

In this manner the plan can be continually updated to reflect the systems and processes needed for an effective RCRA compliance program.

This methodology provides the plan with the flexibility needed to prepare for and incorporate changing compliance needs as the Rocky Flats Plant moves through the transition process from weapons component production to environmental remediation (including economic development).

Although significant accomplishments and improvements have been made in the waste management programs during the post three years, Rocky Flats as a whole has not met the DOE's and EG&G Senior Management's proficiency targets.

Weaknesses in the existing compliance process include, but are not limited to, the following; 1) not fully formalized and integrated tracking system to identify and capture recognized regulatory deficiencies, 2) inconsistent rigor of self evaluations/self assessments throughout plant site, 3) inconsistent level of understanding of environmental requirements by operations personnel, 4) disproportionate reliance on inspection/oversight groups to identify deficiencies and track progress on their correction, and 5) diffuse responsibility and accountability for rectifying recognized deficiencies.

To correct these weaknesses, Rocky Flats Plant (RFP) is embarking on a new approach to achieving and maintaining compliance.

Past efforts to improve Rocky Flats compliance posture relied on top down programmatic guidance with the expectation of floor level implementation by operating personnel. The new approach concentrates authority and accountability for compliance with the line operating personnel with support provided from the programmatic functions.

This approach will require a higher degree of integration and coordination between the operating and program support organizations.

The principal changes in emphasis are; 1) increased line operations involvement, knowledge and accountability in compliance activities, 2) improved management systems to identify, correct and/or avoid deficiencies and 3) enhanced management attention and employee awareness of compliance related matters.

Two principal themes characterize the new approach; 1) focus on processes and systems to achieve sustained compliance, 2) emphasis on operating groups control.

To be successful, Rocky Flats needs to develop, implement and continuously improve the systems and processes essential for compliance.

This requires greater attention be paid to identifying and addressing the underlying causes for non-compliant situations and instituting better methods for recurrence control to prevent their future occurrence.

In addition, operations personnel are responsible for the day to day floor level management of regulated units and action in Rocky Flats facilities.

To ensure sustained compliance, operating groups need to be more directly involved in the decision making processes affecting compliance activities in their facilities.

Five new initiatives are being instituted to facilitate implementation of the new approach. These initiatives are; 1) Well defined ownership and accountability for regulated units and activities, 2) Organizational changes to strengthen environmental capability within the operations organization, 3) Improved operating group compliance competence, 4) A recognition of the distinction between achieving compliance and maintaining compliance and 5) Operating groups taking charge of their relationship with the regulating authorities.

Operating organizations implement the HWCPP at the functional level and are responsible for completing day to day

activities required to maintain RCRA compliance in the work place.

They are engaged in direct hands on execution of regulated activities and operation of regulated units. This includes, but is not limited to, waste generation, waste packaging, unit inspections, and operation of waste collection units, storage areas and treatment equipment.

A key factor in the successful implementation of an effective HWCPP is strengthening the control and decision making capability of operating groups in day to day compliance activities.

Occasions may arise in which DOE desires a change in scope and/or schedule of a corrective action plan for a particular deficiency. This could be self-initiated within DOE or prompted by comments from a regulatory authorities.

Under such circumstances, written notification for a desired change is to be provided to the HWCPP Program Manager who will in turn formally notify the responsible manager for the affected corrective action. The responsible manager will then work with the appropriated DOE counterpart to reach agreement on the change.

Revised corrective action plans will be subsequently provided. If agreement cannot be reached between the corrective action plan manager and the DOE counterpart, then written notification is to be made to the HWCPP Program Manager.

Under these circumstances, the HWCPP will forward the dispute to the Environmental Compliance Task Force (a joint committee of Senior EG&G and DOE Managers) for resolution.

Operating personnel are expected to be sufficiently knowledgeable about the regulatory requirements governing their respective work activities that they will perform their job in a compliant manner.

This means that operating personnel will

not necessarily be authoritative experts on all aspects of RCRA compliance, however, they will be knowledgeable of the compliance requirements directly affecting their specific job duties.

They will be trained to properly make waste determinations on; 1) waste forms generated based on process knowledge, 2) Waste Stream and Residue Identification and Characterization (WSRIC) book, 3) Material Safety Data Sheets (MSDS) information, and/or previously acquired analytical data, 4) properly packaged waste in accordance with specified procedures designed to satisfy regulatory requirements and repository waste acceptance criteria, 5) arrange for proper storage, 6) ensure that waste stream constituent information is accurately reflected in WSRIC, 7) knowledgeable of operating requirements governing their specific regulated units' physical condition, operating procedures, allowable waste forms and documentation necessary for the operating record.

EG&G has clearly communicated that it holds line management accountable for compliance within Rocky Flats facilities.

Line management ownership and accountability provides the structure that ensures compliance. To accomplish this objective, processes are being put in place to address non-compliant environmental activities.

To establish ownership, lists of environmental regulated units are being compiled for each building/area and a single supervisor explicitly designated as owner for each unit.

The owner of each unit has full responsibility for assuring that the unit is operated and maintained in compliance with applicable laws and regulations.

Accountability will be accomplished through; 1) annual performance plans detailing specific performance objectives for individual supervisors and 2) a progressive system of discipline rigorously enforced for compliance related

infractions.

Maintaining environmental compliance entails serious consequences for the protection of the environment, health and safety, as well as individual and company liability. These consequences dictate that progressive discipline is appropriate when there is a failure to comply with environmental regulatory requirements. Disciplinary actions will include verbal and written warning, suspension and termination depending upon the severity of the infraction and/or the frequency of occurrence. For any given facility, the landlord (organization responsible for the physical condition of the facility and provides the necessary common support to ensure major facility components are functioning as intended) is ultimately responsible for the facility's compliance status.

As such, landlord management is authorized and expected to address non-complaint operations.

This will be accomplished in two ways; first the Operations Manager (OM) or designee will issue a letter to the owner of the unit or activity requesting that the deficiency be corrected immediately, the cause be identified and recurrence control methods implemented.

In the case of subcontractors, the EG&G representative controlling their activity will be notified.

It is incumbent upon the owner to ensure sufficient controls are in place to maintain environmental compliance and that subordinates and support organizations are performing all activities adequately.

If a pattern of non-compliances is prevalent with a particular owner, a letter will be issued to the affected Associate General Manager (AGM) requiring the unit or activity to be brought into compliance.

The AGM must initiate disciplinary actions, as appropriate, up to and including removal of the owner from the facility or provide justification to the OM

for retention.

The second method to establish ownership and accountability is for the OM or designee to stop work when non-complaint operations are left uncorrected.

In order to resume operations in units which were issued a stop work order, the unit owner is required to provide documentation to the OM describing steps taken to correct the non-compliance and actions instituted to prevent its recurrence.

To facilitate compliance, an Operations Order has been established that requires specific criteria to operate regulated units.

They are; 1) Waste Generator? RCRA Custodian training requirements, 2) Environmental compliance references, 3) Stop Work Order practices, 4) Operating Record information that includes the list of regulated units and owners, WEMs database for container inventory as applicable, inspection log sheets, PATS deficiencies, IWCP deficiencies, Discovered container information, listing of trained RCRA Custodians, Waste Generators, and Trainers.

To assist the OMs in their implementation the HWCPP, position of Environmental Coordinators (ECs) and Environmental Program Managers (EPMs) was established.

The primary role of the EC is to interface with line operating personnel within a given facility and to provide direction and assistance on all environmental compliance issues.

This includes working with regulated unit owners, waste generators and other operating personnel involved in compliance activities to determine applicability of requirements to their affected actions and facilitate their ability to conduct work appropriately.

They ensure floor-level compliance procedures are accurate and include appropriate building specific information. Also, they also ensure that compliance

record maintained in the central building file are complete and accurate.

ECs ensure required environmental self evaluations are performed and that identified non-compliances are entered into PATS. They assist affected operating personnel in preparing corrective action plans, compensatory measures and recurrence control mechanisms. It is the ECs responsibility to keep the OM informed of compliance conditions in their respective facilities either directly or through the EPM.

The EPMs ensure that compliance activities are coordinated consistently within their respective areas, including development of implementing procedures, budgets for environmental compliance, data collection, and action plan approval.

The EPMs serve as liaison between the line organization and other organizational entities such as CDH, DOE and other EG&G organizations regarding compliance issues related to facilities under their jurisdiction.

The distinction between achieving versus maintaining compliance is recognized by the Rocky Flats compliance program.

Achieving compliance typically addresses near term correction of recognized deficiencies generally conducted as a campaign to fix problems as rapidly as possible.

Such campaigns are usually high visibility, resource intensive efforts narrowly focused on specific weaknesses.

Once the specific deficiencies are corrected, management attention and resources all too frequently diverted to other problem areas without adequate provisions for recurrence control addressing the underlying causes that contributed to the original deficiency.

On the other hand, maintaining compliance involves developing and

implementing systems and processes that, when mature prevent deficiencies from occurring.

This is a more long term effort and is essential for EG&G to accomplish its goal to institute and effective program for sustained compliance.

Our program is in its infancy and EG&G has already began the process of improving environmental compliance.

With employee involvement in day to day activities and strong management support, the HWCPP will become the cornerstone for a proactive and successful environmental compliance program at Rocky Flats.

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