TANK FARM VAPORS AND WORKER SAFETY

Dear Mr. Lindholm:

The Hanford Atomic Metal Trades Council (HAMTC) is in receipt of Washington River Protection Solutions (WRPS) correspondence dated July 7, 2016 regarding the above referenced subject. As stated in HAMTC letter dated June 20, 2016, the Council appreciates the efforts thus far, including those addressed in WRPS letter of June 21, 2016 and subsequent letter of July 7, 2016. However, even with all the efforts to date, workers continue to report odors and noxious chemical vapors emanating from the tank farms which has the serious potential to cause adverse health effects, both short-term and long-term.

In regards to your letter of July 7 stating that “WRPS proposes to implement the following additional actions in the spirit of good faith and partnership with the Hanford Atomic Metal Trades Council (HAMTC)”, the Council provides the following response. And to be clear, HAMTC did not “propose” or “request” anything. HAMTC did in fact, “demand” that WRPS and DOE immediately implement certain actions in order to protect the Hanford workforce and make every effort to provide a safe and healthy work environment, free from hazards, for our represented workers.

1. All work activities which causes, or may potentially cause, the emission of chemical vapors including intrusive, sluicing, retrieval, transfers, pumping, sampling, mixing, breaching, venting, vessel dump, air abatement, leaks, spills, airlift circulation, caustic additions, invasive, disturbing, etc. shall be performed on backshifts and weekends;
   - WRPS seems to support this demand and is vaguely requesting a special shift. However, special shift requests must be in accordance with the parties Collective Bargaining Agreement (CBA), including specific hours of work, start and end dates, and associated classifications. The Council will expect a special shift request letter, consistent with all CBA provisions, in a prompt manner.

2. During all work activities as described in Number 1 above, a vapor control zone shall be established no less than 200 feet away from the perimeter fence line of the applicable tank farm in which the above described work is occurring;
   - As discussed, due to the different configurations of each tank farm and the perimeter fences, the establishment of a Vapor Control Zone or Vapor Reduction Zone will have to be determined during the planning phase for the above referenced activities. The Council expects full involvement in order to determine if the intent of the demands described in Number 2 have been satisfied.

3. All work inside the established vapor control zone shall be performed while wearing mandatory supplied air;
   - Not specifically addressed. However, this can be addressed during the successful implementation of Number 2 above.

4. All roads and access points shall effectively be barricaded to prevent/restrict unauthorized entry into the vapor control zone and shall be strictly monitored and enforced;
   - Again, this can be satisfactorily addressed during the planning phases.
5. All work inside the perimeter fences of any tank farm shall be performed while wearing mandatory supplied air;
   • Absolute failure. WRPS states that “based on our technical evaluations, the TVAT report, and the mitigation actions described above, there is no basis for mandating SCBA equipment for routine activities within double-shell tank farms”. This is the same type of negligent rhetoric that workers have been receiving for more than twenty (20) years. If WRPS' technical evaluations and mitigation actions were actually working as suggested, then workers wouldn’t continue to be experiencing adverse health effects as a result of tank vapor emissions. Nevertheless, it is clear that WRPS refuses to comply with our demands for a safe and healthy work environment. As such, the Council hereby provides official notification that a standing Stop Work order is now in full force and effect until such time that all work inside the perimeter fences of any tank farm is performed while wearing mandatory supplied air.

6. All SCBA bottles shall be limited to 30-minute cylinders. All use of the 60-minute cylinders shall immediately be discontinued and removed from service. In addition, more emphasis should be placed on acquiring alternative supplied air respirators such as re-breathers, lighter cylinders, and more advanced equipment and ergonomically designed harnesses such as the MSA G-1 system;
   • Ongoing. The Council will evaluate WRPS progress.

7. Ensure effective communication is provided to all the site contractors prior to any activities referenced in number 1 above.
   • Ongoing. The Council will evaluate WRPS progress.

In regards to HAMTC strong recommendations, the Council will closely monitor and evaluate WRPS progress.

The Council recognizes the importance and great responsibility to execute the U.S. Department of Energy tank waste cleanup mission. However, such mission does not, and will not, take precedence over worker safety. WRPS states they are “implementing a comprehensive, multi-faceted program to enhance tank farm worker protection to a level that continues to exceed today's industry and regulatory standards”. Interesting analogy. The Council is unaware of any comparative "industry" in which workers are required to perform activities in and around 177 underground storage tanks that hold 56 million gallons of high-level nuclear waste and toxic chemical waste, 1800 chemicals detected in the vapors contained in the tank headspaces, any number of which have been released into the working environment through unpredictable sources...and the list goes on and on. The fact is, there is no other “industry” like Hanford. Hanford has its own unique circumstances and safety and health challenges whereas requiring our own unique and challenging solutions. We need to set the standard, and set it high. WRPS letter of July 7 is filled with good intentions and an overly optimistic vision for the tank farm of the future. However, HAMTC expects WRPS to implement immediate actions to protect workers from exposure or potential exposure to chemical vapors emanating from the tank farms of the present.

The Council will continue to work with DOE and WRPS to ensure the safety and health of the Hanford workforce. However, our demands should not be confused with proposals or simple requests. Should WRPS fail or refuse (as in Number 5 above) to implement our demands in a prompt manner, we will take any and all actions we deem necessary to enforce our position.

Sincerely,

HANFORD ATOMIC METAL TRADES COUNCIL

David E. Molnaa
President