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PRESIDENT

HAMTC



Hanford Atomic Metal Trades Council

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June 20, 2016

Mr. Kevin Smith, Manager
Department of Energy-Office of River Protection
P.O. Box 450
Richland, Washington 99352

Mr. Mark Lindholm, President and Project Manager
Washington River Protection Solutions
P.O. Box 850
Richland, Washington 99352

TANK FARM VAPORS AND WORKER SAFETY

Dear Mr. Smith and Mr. Lindholm:

The Hanford Atomic Metal Trades Council (HAMTC) is deeply concerned regarding the safety and health of the Hanford workforce while performing activities in and around the Hanford tank farms. As you are fully aware, during a relatively short time period in the spring of 2014, several workers received medical attention following exposures from vapors emanating from the waste storage tanks or other sources at the tank farms. Since that time, the reports from workers of odors and noxious chemical vapors have significantly increased and continue to this day. While the chemical vapor exposure issue is certainly not new and has been the subject of assessment efforts accompanied by issuance of formal reports and recommendations for more than twenty (20) years, workers continue to experience adverse health effects as a direct result of tank farm vapor emissions. The Council firmly believes that more immediate actions need to be taken in order to prevent further exposures or potential exposures to the workforce.

The Council certainly appreciates the efforts thus far including the Hanford Tank Vapor Assessment Team and subsequent report, mandatory use of supplied air during certain activities, increased monitoring and associated personnel, deployment of state-of-the-art vapor detection equipment, numerous meetings and briefings, and access to critical data. The more recent efforts regarding data collection and access to that data are important and should continue. However, such data has so far only proved itself useful *after* an incident has occurred. Nevertheless, such efforts have done little to finally resolve the issue or at least significantly mitigate the most critical aspects of the problem; exposure or potential exposure to the workforce from chemical vapors emanating from the tank farms which may result in both short-term and long-term adverse health effects.

10 CFR 851 Worker Safety and Health Program clearly dictates that the employer is responsible to "Provide a place of employment that is free from recognized hazards that are causing or have the potential to cause death or serious physical harm to workers...". It is well established that chemical vapors emanating from the tank farms are a recognized hazard. As such, the Council expects, and quite frankly demands that both the Department of Energy (DOE) and Washington River Protection Solutions (WRPS) make every effort to provide a safe and healthy work environment, free from hazards, for our represented workers.

The Council believes the time for requests, suggestions and/or recommendations has long since passed and that a more aggressive approach and immediate actions are required. As such, the Council *demands* that DOE and WRPS immediately implement the following actions in order to protect the Hanford workforce.

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;
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;
3. All work inside the established vapor control zone shall be performed while wearing *mandatory* supplied air;
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;
5. All work inside the perimeter fences of any tank farm shall be 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;
7. Ensure effective communication is provided to all the site contractors *prior* to any activities referenced in number 1 above.

In addition to the above demands, the Council respectfully, but strongly, recommends that DOE and WRPS provide the following:

1. Improved turnaround times for sampling results, both personal and environmental;
2. Ensure the workers are provided access to all data in order to promote transparency and full disclosure;
3. Improved medical and first aid coverage by HPMC;
4. Increased emphasis on implementing TVAT recommendations in a timely manner;
5. Relocate all non-essential personnel, equipment and trailers out of the surrounding areas of the tank farms and out of the vapor control zones. In addition, abandon any further strategies to place additional personnel, equipment or facilities around the surrounding areas of the tank farms;
6. Reader boards indicating the work activity with visual and audible alarms;
7. Ensure all personnel are provided with effective communication resources while performing work in and around the tank farms (hand-held and vehicle radios, site-wide announcements, etc.);
8. Improved IHT training and equipment;
9. Improved monitoring equipment, both personal and environmental;
10. Improved exposure assessments, exposure controls, safety and health management policies and operational procedures;
11. Ensure adequate de-con resources are available in the event of a radiological and/or chemical vapor incident.

Mr. Smith & Mr. Lindholm

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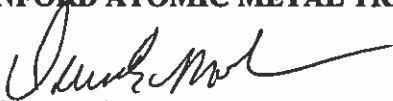
The Hanford workers are one of the most highly trained and skilled workforce in the DOE complex. Our dedication and commitment has continuously provided a valuable service to the federal government for almost seventy (70) years. We are proud of our accomplishments and look forward in continuing to provide this valuable service in the ongoing clean-up efforts, Vit Plant operations, and the overall Hanford Mission. However in doing so, workers should not be subjected to, and will not tolerate inadequate, substandard or unsafe working conditions that may affect their health and safety. The Council believes our demands are not unachievable nor unreasonable. We deserve the same dedication and commitment to worker safety and health from DOE and WRPS, commensurate of the years of service we have provided, in order to promptly effectuate the necessary changes described herein.

The Council understands there may be unique circumstances (physical building locations, evaporator campaigns, continuity of critical operations, emergencies, etc.) which may prevent strict adherence to the above referenced items. In the event such circumstances *do* present themselves nearly impossible to adhere to our demands, HAMTC expects to be consulted prior to the applicable work activity in order to provide reasonable alternatives and operational flexibility.

Thank you for your attention and action regarding this extremely important matter. Should you have any questions, please call the HAMTC office.

Sincerely,

HANFORD ATOMIC METAL TRADES COUNCIL



David E. Molnaa

President