

H2C Response to HAMTC Management Decisions Requested (Attachment 9, STC Report No. 5)

1. Purpose, Scope, and Basis

This document provides H2C's formal responses to the five "Management Decisions Requested" in Attachment 9 of the STC Report No. 5_Final Submission.

2. Executive Summary

H2C agrees that safety assurance, monitoring reliability, and workforce qualifications are essential elements. Based on the evidence documented in the 2026 Tank Vapor Respiratory Program Effectiveness Assessment, and recommended by StoneTurn Consultants in its final report, H2C intends to implement a phased, hazard-based respiratory protection approach for designated Tank Vapor Work Categories while preserving employees' rights to voluntarily upgrade protection and maintain defense-in-depth safeguards.

With engineering and work controls in place, neither WRPS nor H2C has identified tank-vapor overexposures exceeding occupational exposure limits. When unexpected field conditions arose, the controls established to protect workers proved effective. These findings support the independent third-party reviewer's conclusion that the tank-vapor program controls are in place and protect workers.

3. Responses to HAMTC Management Decisions Requested

3.1 Decision 1: Do not authorize implementation of the proposed hazard-based respiratory protection plan at this time; maintain existing respiratory protections.

H2C operates a world-class vapor control and respiratory protection program, as confirmed by the independent assessment conducted by StoneTurn Consultants (STC). STC concurred that H2C's technical basis, safety systems, and management strategy fully support transitioning to hazard-based respiratory protection and specifically recommended a phased implementation approach in their final report. Workforce feedback strongly aligns with this direction—80% of employees support moving forward with the program changes and agree that a phased approach is the right path. Employees who prefer to continue using respirators will retain that option.

Based on STC's conclusions, documented program maturity, and clear workforce support, H2C is positioned to proceed with a phased implementation of hazard-based respiratory protection.

3.2 Decision 2: Require an H2C assurance period with defined duration, measurable safety-performance criteria, and independent verification before reconsidering any reduction in respiratory protection.

Since assuming responsibility for Tank Farm operations in February 2025, H2C has demonstrated stable operations, continuity of institutional knowledge, and successful stewardship of safety, industrial hygiene, and radiological control programs. The transition from WRPS involved minimal organizational disruption, with only a small subset of leadership roles changing and several senior personnel maintaining continuity from the prior contractor. This organizational stability helped preserve the integrity of the technical bases, operating procedures, and safety systems already in place. The assessment from Stone Turn was completed 15 months into H2C's tenure and validated the program under H2C's leadership.

H2C has demonstrated effective implementation of the tank vapor controls by successfully conducting numerous single-shell tank retrievals, tank waste transfers, TSCR batches, and 242-A Evaporator campaigns during the last 19 months— all without exceeding an occupational exposure level.

3.3 Decision 3: Direct a VMDS recovery plan with a target availability of at least 95%, defined redundancy, preventive-maintenance actions, and routine executive reporting.

Although VMDS is a defense-in-depth system for actively ventilated double-shell tank farms, H2C recognizes the need for improved reliability, and will establish appropriate goals. H2C initiated activities to replace the current system with an improved design which requires less maintenance and has increased the priority of maintaining the current VMDS until upgrades can be completed.

3.4 Decision 4: Require common vapor-protection qualification for borrowed workers, building trades personnel, and subcontractors before assignment to affected work.

H2C recognizes the need for a consistent baseline of vapor-control knowledge across all personnel. A uniform qualification standard already exists and is applied through Industrial Hygiene and Chemical Worker Training programs, which incorporate tank vapor work categories, PAM use, odor response, hazard recognition principles, and tank farm entry requirements. These trainings also provide task specific information on tank vapor hazards, controls, monitoring systems, and response protocols.

Borrowed workers and subcontractors are required to complete applicable training modules and any identified gap training before receiving authorization to work within tank farm boundaries. Verification occurs through established training records, field access processes, and pre-job briefings.

3.5 Decision 5: Establish joint oversight with HAMTC to verify workforce engagement, corrective-action durability, and continued effectiveness of controls developed under WRPS.

While responsibility for program oversight, decision-making authority, and implementation of the respiratory protection strategy resides solely with H2C, we remain committed to maintaining a transparent, collaborative approach that ensures worker perspectives are consistently and constructively incorporated. HAMTC's engagement will continue to support open communication, shared understanding of protective measures, and the continuous improvement of tank-vapor controls.