

ATTACHMENT 1

Memorandum

SEP 13 1993

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EM-453 (J. Ciocco, 3-7459)

Draft Rocky Flats Hazardous Waste Compliance Program Plan

Michael S. Karol, Assistant Manager for Facility Operations
Rocky Flats Office

The Environmental Restoration Program, Office of Southwestern Area Programs has reviewed the Draft Rocky Flats (RF) Hazardous Waste Compliance Program Plan as requested in your memorandum of July 2, 1993. The plan contains many elements of an effective compliance program plan, but appears to be more reactive than proactive. Specific recommendations for improving this plan include the following.

1. Instead of viewing compliance as an "absence of violations," take a more positive approach viewing compliance as daily attention to the Resource Conservation and Recovery Act (RCRA) requirements. The foundation of compliance was appropriately identified as "creating a fully mature and effective hazardous waste compliance program" incorporating: the identification of RCRA regulations requirements and standards; the translation of the requirements into easily understood procedures; the training of personnel to follow the procedures; the provision of proper supervision and management; the tracking of recognizable deficiencies and the progress of corrective actions (page 39, paragraph 2).

RF is staffed with innovative, creative, and knowledgeable personnel. Using this highly skilled workforce with the proper systems in place, non-compliant situations should be easily identified before any inspection from the regulators.

2. Inadequate training and understanding of RCRA requirements was cited in the Notice of Violation (NOV). The program plan implemented requires a fundamental culture change where each employee that handles hazardous waste has a very clear understanding of all RCRA requirements. This may be accomplished by "revising the current training program," but the implication from the NOV is that current training methods are not working. A fresh approach is needed. Evaluate the chemical industry training programs for types of training, frequency of training, refresher courses, and conveying the basic knowledge of the RCRA requirements.

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3. Clear lines of accountability need to be identified within the program plan. The current plan contains confusing lines of authority. Are senior managers responsible or are the line managers responsible? The idea of using an Environmental Coordinator for each building or area is good, but what is their authority? One section discussed accountability for rooms and/or equipment. This is a very good way to demonstrate accountability. Add more information about the qualifications of the responsible personnel to show thorough knowledge of RCRA requirements. In the section discussing roles and responsibilities, add a schematic diagram showing who is responsible for what. Who has the authority to shut down the systems, if they are out of compliance?

4. The fundamental problem with Contingency Planning is not clearly identified. Is the problem failure to notify when there is a release or failure to respond when there is a release? Augmenting this section of the program plan will strengthen the plan. Emphasis should be on response to emergency situations, keeping upper management informed, and timely notification to regulators. In developing emergency response procedures clearly identify what constitutes an emergency, who responds who notifies the regulators, what actions are taken immediately, and what follow-up actions are taken. The emphasis should be action-oriented not paperwork-oriented.

5. Waste characterization plans discuss annual updating of waste analysis plans. If the processes are well-known and static, then an annual update of the waste analysis plan is what the RCRA regulations require. If the processes are unknown and dynamic, then annual updating of the waste analysis plan is insufficient. The waste analysis plan should be updated whenever there is a process change. Incorporate more frequent evaluations of process waste knowledge.

6. Documentation and improved tracking systems were identified in the program plan as a means to improve compliance. Correct procedures will assist personnel in knowing what is expected for achieving compliance, but procedures will not accomplish compliance. The personnel must accomplish compliance by knowing RCRA requirements and following the right procedures. Improved tracking systems will aid in corrective actions. However, the objective is to have personnel complete their work correctly the first time.

7. An effective oversight system will assist in finding root causes where procedures are not being implemented correctly. Many of the organizations and processes outlined in the program plan appear to be checkers checking the checkers, i.e., Root Cause Analysis, Compliance Ombudsman, verification processes, corrective action system, and internal oversight program. Implement a system where line management has the responsibility, the accountability, and the authority to perform the work. Then add a simple oversight system to validate the system.

ATTACHMENT 2

Subject: Review of the August 13, 1993 Hazardous Waste Compliance Program Plan, EG&G Rocky Flats, Inc. Golden Colorado.

Refer To: Martin G. Seitz (202) 586-3183

Overall

The Hazardous Waste Compliance Program, in my view, is being conducted aggressively and effectively. The document, Hazardous Waste Compliance Program Plan, does not convey the strength and effectiveness of the Program. This revision is fundamentally different from the June 15, 1993, draft and did not preserve the strengths of the June 15 draft. The document is not coherent and suffers from poor editing and incorrect statements.

I recommend that the draft be revised to depict the actual Hazardous Waste Compliance Program more accurately and to show the path to compliance (meeting the (more than two) milestones of the Agreement and Stipulated Order on Consent).

Executive Summary

The Executive Summary (ES) has a good beginning sentence, but the second sentence and other portions of the ES should be rewritten. The purpose of the plan is (not) to describe tasks.....

Not, the purpose of the plan.... aims at addressing (rather, the plan addresses...)

Not, approved funding to implement the identified deficiencies (rather, approved funding to implement corrective actions).

Make sure the ES reflects ideas that are developed in the body of the plan.

Introduction

Check the practice of not defining acronyms when they are used initially in the body of the plan. Is their being defined in the Executive Summary sufficient? Is their being defined in the "List of Acronyms" sufficient? Check with the style manual used for this document.

Section 1.0 Program Management and Implementation

The chapter titled Organization speaks of two types of organizations, organization of the RCRA program and EG&G organization on plant site. The first paragraph addresses these organizations in different sentences and does not relate them. Is the organization of the RCRA program modeled after the EG&G organization?

The chapter titled Organization introduces the terms Environmental Coordinators and Environmental Program Managers. Later additional terms of Operations Environmental Coordinator and RCRA Custodians are used. Should these terms be introduced as part of the new organization?

The E&WM Waste Programs group is sometimes referred to as E&WM (page 6) and sometimes as Waste Programs (page 10). Pick one title or the other.

Figure 1.1.1 needs a title. Also, the lettering should be made larger to make the figure easier to read. Based on the figure, the SWECMP is incorporated into the HWCMP. Is this correct?

Section 2 Major Elements & Section 3 Corrective Actions

02/17 The HWCPP is organized with requirements and deficiencies listed in Chapter 2 and remedial actions (The Plan) listed in Chapter 3. This organization makes the HWCPP tedious to read. (The organization stems from the logic(al) process to identify requirements, identify deficiencies, and finally identify action plan.) Often the remedial action does not address the plan. For example, meetings described in 3.18 do not address training deficiencies described in 2.2.7.

Manger is a word that will not be picked up by a spell checker as an incorrect spelling of manager. Other editorial notes are made in the text.

Section 4 Milestones

The HWCPP does not address milestones listed in the draft (5/26/93 with updates through 6/15/93) Agreement and Stipulated Order on Consent for the June 17, 1992, CDH NOV (No. 92-06-17-01). The HWCPP lists only two milestones in Chapter 4 (the December 31, 1993 completion and implementation of building books for Buildings 460 and 559; and the December 31, 1993, implementation of building books in all other RFP buildings). But the Agreement has additional milestones. The Agreement calls for EG&G to notify CDH immediately, in writing, upon discerning that compliance by December 31, 1994, deadline will not be possible. The Agreement calls for EG&G, on or before Aug 13, 1993, to complete all corrective actions necessary to respond to allegations cited in the NOV. The Agreement stipulates that within 14 days of a "Newly-identified Deficiency" that EG&G complete the following: (1) establish a compliance schedule for when the "Newly-identified Deficiency" will be resolved, (2) etc. Other milestones exist in the Agreement, and must be addressed in the document.

In summary, Section 4, titled Milestones, is incomplete and has no connection to the other parts of the HWCPP. Performing the HWCPP, as written, will not necessarily satisfy the milestones of the Agreement. The HWCPP should lay out a program that will meet these milestones.

The Agreement states that "the HWCPP has the purpose of achieving and maintaining compliance with the requirements of Colorado's Hazardous Waste Act (ss 25-15-101 et seq.; C.R.S.) and implementing regulations. Also, the Agreement states that the HWCPP utilized the practical experience gained from

the Pilot Study. The Agreement states that the HCPCP describes tasks to identify building-specific requirements". The document, HCPCP, should be made to reflect these statements in the Agreement.

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the Pilot Study. The Agreement states that the HCPCP describes tasks to identify building-specific requirements". The document, HCPCP, should be made to reflect these statements in the Agreement.

ATTACHMENT 3

United States Government

Department of Energy

memorandum

Rocky Flats Office

DATE: AUG 16 1993

REPLY TO
ATTN OF: WPD:FWG:08840

SUBJECT: Approval of Hazardous Waste Compliance Program Plan

TO: H. P. Mann
General Manager
EG&G Rocky Flats, Inc.

The Draft Consent Agreement for the June 17, 1992, Colorado Department of Health (CDH) Notice of Violation requires, in part, that EG&G must submit a compliance plan by August 16, 1993. According to the draft agreement and guidance from the CDH, the plan must include the specific methods Rocky Flats Plant will employ to implement the plan for gaining full environmental compliance by December 31, 1993, for Buildings 559 and 460, and by December 31, 1994, for the remainder of the plant. EG&G has submitted several draft revisions of the subject plan to my staff for review to fulfill this requirement. Your staff is working on a new revision, at the time of writing. Based on the understanding that the subject plan is (in agreement with CDH) subject to ongoing review and revision, approval is conditionally granted, but it must undergo revision as indicated below.

Major changes are still being made to the plan in response to substantive comments made by my staff and they will not have time to review this version before EG&G submits it to CDH. The major deficiency in the plan is that it does not clearly describe the actual methods EG&G will use to implement the plan based on FY1994 funding levels. It is important that the RFO Work Package Managers and Program Managers have time to review the plan and assess the impact on work packages and programs. The RFO will be asked to complete their review of your latest version of the plan, including discussing any funding and program management concerns with their EG&G counterparts by September 20, 1993.

By October 4, 1993, the plan must be reissued and received by RFO with the comments incorporated. I also expect your transmittal letter to CDH will indicate our conditional approval of the plan and the rationale we have used for that approval.

ORIGINAL SIGNED BY

A. H. Pauole
Acting General Manager

cc:

X. Ascanio, DP 6.1
R. Duvall, EM-30
W. Bixby, EM-60
M. Seitz, EM-64
P. Bubar, EM-323
J. Hartman, AMTER, RFO
M. Karol, AMFO, RFO
V. Witherhill, AMTS, RFO
K. Izell, OCC, RFO
D. Sargent, PAQAO, RFO
M. McCormick, OD, RFO
J. Wienand, WPD, RFO
S. Cooke, EG&G
T. Hedahl, EG&G
E. Schneider, EG&G
G. Potter, EG&G

ATTACHMENT 4

AMEM REVIEW OF TECHNICAL DOCUMENTS

REVIEW COMMENT RECORD

AMEM
Form 91-01
Rev. 2; 05/13/92

Document Reviewed (Title, Number, Revision, Date, etc.) Hazardous Waste Compliance Program Plan, rev. 813, 1993		Reviewer: Environmental Compliance Task Team Date: 9/20/93, rev. 9/22/93 Phone: (303) Organization: Environmental Compliance Task Team		Agreement with Dispositions: Date: Reviewer: Document Preparer:		
*Comment Type: E = Essential (agreement must be documented for other than verbatim incorporation); S = Suggested; N = Nonconcurrency (response is required)						
Com. No.	Com. Type*	Page/Para No.	Comment			Disposition
1	E	General	The following comments including those of M. Seitz (draft was faxed on 09/17/93) and EM-453 (faxed 9/22/93) require formal response/disposition from EG&G Many of the comments made by RFO on the Site-Wide Environmental Compliance Program Plan (SWECPP) and the previous version of the Hazardous Waste Compliance Program Plan (HWCPP) have not been incorporated into this version. Many of them address the same concerns that CDH stated during the July 20, 1993, meeting. They range from programmatic issues to typographical and editorial corrections.			
			The previous comments must be addressed despite the change in format and content.			

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2	E	General		
			<p>As with the previous reviews of the draft Plans, the Waste Programs Division cannot concur with many of the tasks, deliverables, due dates (or lack thereof), or criteria to determine success. It is questionable from a review of this document that EG&G will actually be able to achieve compliance by the NOV settlement agreement due dates.</p> <p>The linkages between the basic elements of a compliance program, current problems, and EG&G's plans for overcoming the problems and meeting the needs for establishing and maintaining the basic elements is still unclear for some issues such as the overall corrective action program, including environmental compliance reporting. The logic is missing as to how many of the tasks will come together to solve the identified problems in their entirety. The sections describing how the sum of the related corrective action plans will correct the identified deficiency need to be expanded to address this. Also, section 1 or 2 should contain the specific requirements of the draft NOV settlement agreement and specify which corrective actions address them and how they will act together to achieve them.</p> <p>As with the previous versions, many of the tasks and deliverables are just repetitions or recombination of ones that have been tried in the past without success. Some of the plans and tasks have unjustifiably long due dates, e.g., RCRA training, Plant-wide Corrective Action System, PATS, hiring and training of ECs, etc.).</p>	
3	E	General	<p>Also, describe and provide specific schedules for how the information from the Pilot Building Program will be disseminated and adopted by the other buildings. Specify how the adopted changes will be standardized to assure conformance throughout RFP.</p> <p>This plan does not provide specific information or schedules for Environmental Restoration to regain waste management compliance. It also does not include reference to corrective action plans for resolving waste storage issues. The HWCPP should include a comprehensive, detailed corrective action program for ER waste management compliance.</p>	
4	E	General	<p>Numerous typographical and grammar errors still exist. The document needs to be proofread.</p>	
5	E	1.0	<p>On 7/13/93 and several other occasions, CDH said they expect this document to be an implementation document. It is still not fully described in this version how the overall program will be implemented and overseen.</p>	

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6	E	1.0, Organization, ¶ 2, and § 3.2	<p>Although there is some discussion for improving the systems and processes to achieve sustained compliance in the Plan, it is primarily directed at Operations and tenant organizations. The Plan does not provide adequate detail on improving the systems and processes of the critically important support organizations, such as, Radiation Protection Technologists (RPTs), E&WM, Procurement, Engineering, etc. Information on the continuing "shortage" of RPTs and how it will be resolved, insofar, as its impact on environmental compliance is concerned should be provided and specific tasks for correction should be included.</p> <p>See comments previously submitted that state the need to clearly cover and describe the roles, responsibilities, and function of support organizations. Include how they are made responsible and accountable for their actions and participation or lack of participation in maintaining or rapidly regaining compliance. Include Engineering, RPTs, Procurement, etc. Ensure that Fred Dowsett's comments on the need for redefinition and reassignment of responsibilities of the support organizations are fully addressed in this section.</p>	
7	E	1.0, p. 5	<p>The statement regarding emphasis in the Plan for improved integration between line operations and programmatic and functional support is not supported by the text, but it should be. It is not clear in the Plan how the support organizations role and missions will change to provide more support and less programmatic direction, e.g. the roles of the Waste Technical Support and the Environmental Coordinators (ECs). This issue should be covered in detail in this plan and in a supporting memorandum of understanding (MOU).</p>	
8	E	1.0, Responsibility, ¶ 1	<p>The Operations Managers have not consistently been attending CDH or EPA inspections. Thus, this has not been satisfactorily complied with. The problem has remained to the extent that RPB has drafted a letter to EG&G providing more direction and guidance. The closed deliverable for requirement #10 in the Ten Point Action Plan for this item must be reopened until compliance with it is consistent.</p> <p>Is the requirement for waste generators to ensure "proper disposal" of their wastes accurate?. It conflicts with statements in the draft <i>RCRA Program Description</i>. If this is accurate, explain how EG&G intends to implement and enforce this.</p>	
9	E	1.0, Responsibility, ¶ 5&6	<p>Describe the actions that will be taken to establish accountability of the waste generators. These paragraphs indicate lack of coordination for functions between Environmental Program Managers and the EG&G E&WM staff. "Programmatic guidance" must be obtained by only one group, not both. For the sake of coordination and efficiency, only one group should be contacting CDH or RFO for guidance. Review why RFO should fund both groups to do this redundant effort. If the EPMs are going to do this, then the work package manager should reduce the funding request for E&WM proportionately.</p>	

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10	E	2.1.2	<p>1) ¶ 2. Despite the comment that Waste Programs has sole responsibility for interpretation of requirements documents, there appears to be overlap in responsibility for this with whoever does the Standards Identification Document (SID), and the ECs and EPMs, especially for interpretation and dispute resolution. Please explain and differentiate.</p> <p>2) Deficiency section. The statement that there are no deficiencies is incorrect, and the system, as described, continues the top down approach. How does the floor level get involved?</p>	
11	E	2.1.3	<p>There are three deficiencies, not just one. 1) Timely communication and explanation of requirements and impacts to buildings from E&WM is not adequate and needs to be improved. 2) Many floor level procedures needed to implement the disseminated information are not prepared.</p>	
12	E	2.2.1	<p>Review the training program schedule to ensure it will be fully functional and result in trained staff to ensure compliance no later than 12/94. (The concern is that staff must be trained well ahead of the compliance deadline to allow time for them to be fully functional by the deadline.)</p>	
13	E	2.2.2	<p>1) Review the corrective action plan for adequacy and timeliness. 2) The procedure for waste identification and Miscellaneous Material Management is deficient. 3) The procedure for management of standing waste in waste process lines, waste and reactive chemicals, etc. is deficient. 4) Does this corrective action plan adequately address resolving the problem of excess analytical turnaround time.</p>	
14	E	2.2.3	<p>Review to assess the corrective action plan in § 3.6 to ensure it will meet RFP needs. 1) The due dates for all 5 of the listed corrective actions should be reviewed for timeliness, and an assessment should be made as to whether or not they will be completed in a timely manner. Provide an explanation for the extended due dates. 2) The deficiency list is incomplete; add another one which requires identification and management of hazardous material in process tanks for which processes are dormant. There should be a specific reference to the Materials Not Classified As Waste project being done by R. Griffis. 3) The permit modification should be added to the list of corrective actions.</p>	

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15	E	2.2.4	<p>This issue is much bigger than described here, and this section should be significantly expanded to adequately address the serious historical and ongoing problems RFP has with tank compliance. An overall plan and program for disposition, management, closure of tanks is needed. Please reference or include the corrective action plan. (See preceding comments, also.)</p> <p>Include a corrective action plan or a reference to an existing one for determining what tanks (and their contents) may be determined to be hazardous waste.</p> <p>Also, the value and ownership of the report and the problems are questionable. Explain why RFP does not instruct all buildings to perform walkdowns and take corrective actions for configuration control in accordance with a plant-wide instruction.</p> <p>Review to determine if the problems with the RCRA Operating Record surveillance were adequately addressed.</p>	
16	E	2.2.5	<p>There are problems with WEMS that are well known, but the Plan does not appear to completely resolve them. Questions include: Is a new procedure needed or should EG&G just revise the existing procedure to save time and expense? Does the corrective action do the following: assure accuracy (including how WEMS enforces requirements for accuracy), provide an easy mechanism for buildings to access the status of their wastes, enhance QA/QC for data control, and enhance ownership and "buy in" by Operating staff?</p> <p>EG&G needs to provide scope, outline, and timetable for tasks 4 & 5 in corrective action 3.8.</p>	

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17	E	2.3.1, 2.3.4, 3.11, 3.12	<p>1) The due dates for completion of the corrections to the Plant-wide Corrective Action System (CAS) and the PATS are so far into the future that they are negatively impacting environmental compliance tracking and trending efforts and RFO relations with the regulatory agencies. The plant-wide CAS procedure which was implemented in 6/93 is not fully functional or useful to function as the system RFP needs for tracking and trending environmental deficiencies. Comments have been received that express the opinion that the implemented system is unwieldy, and it is unreasonably redundant and expensive to operate. (See also comment numbers 6 and 7 in the memorandum from EM-453 to Michael S. Karol, Draft Rocky Flats Hazardous Waste Compliance Program Plan, September 13, 1993.) Comments have been received that the Corrective Action Plan for task 2 on page 44 should be reopened and that the due date on task 5 is not responsive.</p>	
18	E	2.3.2	<p>2) 2.3.4. In their current configuration, environmental compliance Performance Indicators (PIs) and goals are still of limited use to WPD and OD. Some of the PIs do not provide useful or meaningful information. Some goals are so vague or lax that they are meaningless. Assess to determine if the corrective action plan should be revised or reopened to require preparation of new PIs or modifications to existing ones.</p> <p>Independent oversight of programmatic environmental compliance issues and close-out verification remain inadequate based on presentations made to the Environmental Compliance Task Force and information from other sources. Assess to determine if the due date in the corrective plan in 3.15 is responsive, and if EG&G should consider having the Waste Surveillance organization perform programmatic evaluations instead of training another group to accomplish it.</p>	
19	E	2.2.6	<p>Review schedules for section 3.23. Some critical milestones are not due until mid-1994. Is this adequate time to ensure the buildings are in full compliance by 12/94?</p> <p>Review the Pilot Buildings to determine if there are other gaps in procedures such as those that are being done in 3.21 for inspection log sheets that are not covered in the HWCPP.</p>	

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20	E	2.2.7	<p>Not all ECs are hired, and the schedule for training is too long. The qualification requirements may be too extensive, and may not be consistently directed at gaining the specific knowledge the ECs need to do their job. Review the corrective action plan for adequacy.</p> <p>The corrective action plan in § 3.18 does not address all of the requirements or goals mentioned in § 2.2.7. Should this reference § 3.19 instead?</p> <p>The mentor program (section 3.22) milestone does not appear to be timely since it stretches from 10/93 through 12/94. There is no program requirements document, no program plan, no procedure for the program, no buy in by some (all?) of the proposed participants, and no definitive schedule. Also, identify the EG&G manager for the program.</p>	
21	E	2.3.1	<p>1) The self-evaluation program for environmental deficiencies is deficient based on information received from presentations made by EG&G to the Environmental Compliance Task Force and by observation. There is no corrective action plan referenced for it referenced in HWCPP. Review to assess whether or not a corrective action plan is needed. 2) According to PATS users, observations, and a recent WPD surveillance, PATS is not consistently accurate or user friendly. Some buildings do not have terminals to easily access PATS. Review to assess whether or not a corrective action plan is needed.</p>	
22	E	2.3.2	<p>1) Assess the effectiveness of the corrective action plan to ensure that independent oversight of environmental compliance is effective, coordinated, and adequately explained. (See also comment numbers 6 and 7 in the memorandum from EM-453 to Michael S. Karol, Draft Rocky Flats Hazardous Waste Compliance Program Plan, September 13, 1993.) 2) Assess to assure the corrective action plan due date in § 3.15 will meet RFP needs, i.e., will not qualifying all personnel until late 1994 have an impact on achieving compliance?</p>	
23	E	2.3.4	<p>1) The logic and reason for doing many of the tasks is not clear, nor is it clear that completion of the tasks will result in compliance. There is no analysis of the problem compared to the proposed tasks to ensure that the tasks -- singly or in the aggregate -- will resolve the root cause of the problem. In some cases, it is obvious that the tasks will not correct the problem. The Corrective Action Plan should be reviewed and rewritten to ensure that the plan provides concise and complete tasks and criteria for determining success for all of the basic elements of an environmental compliance program. 2) According to the last version RFO saw of the draft environmental compliance procedure, EG&G had significantly complicated the data input and was proposing the use of more than one form. This needs to be cleared up.</p>	

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24	E	2.3.4 and 3.12	<p>This paragraph does not adequately address the need for a comprehensive, workable, usable system for setting priorities, entering environmental deficiencies into the PATS, and for getting many of the problems corrected in a timely manner. These are important compliance issues. (See also related comments under item 17.)</p> <p>Note: A current example of how the Corrective Action System and procedure writing system are faulty is that it will have taken over a year for the environmental deficiency input procedure to have been written and implemented, if it is implemented on schedule. Please review corrective action plans. It is not clear that (even with a roll up of all the corrective actions in this section and the HWCPP as a whole) the proposed system will consistently ensure the rapid and consistent correction of environmental deficiencies. Neither the revised CAS nor other procedures reviewed address the following: the large number of environmental deficiencies currently open, the number of "original environmental deficiencies" still open, failure to correct some of the deficiencies discussed in § 3.17, and lack of control over the unreasonably long due dates for corrective actions.</p>	
25	E	2.4	<p>1) The IWCP process is reportedly still deficient because it does not allow the buildings to easily and consistently obtain project status or schedule on a real-time basis. Please review this element to determine if a corrective action plan to address this is needed. 2) Linkage between the Plant Action Tracking System and IWCP is needed, but is still not available.</p> <p>The prioritization schemes for PATS, IWCP, Issue Management, etc. should be coordinated. Please review to see if a corrective action plan is needed.</p> <p>The lessons-learned program is not working well for environmental deficiencies. It is not clear that the corrective action plan in section 3.13. will correct the overall problem. Review to assess if the corrective action plan is adequate. (See also the related comment following comment.)</p> <p>It is unclear how the proposed system to identify and prevent repetitive deficiencies will integrate and coordinate with the Lessons Learned System which, although it has had very limited environmental compliance success, is already in existence. Describe how the systems will be integrated and coordinated. Is the system funded?</p> <p>Assess to assure that the tasks in §§ 3.12 and 3.13 are not too far into the future to ensure compliance by the settlement agreement due dates.</p>	
26	E	2.4.2		
27	E	2.5.1		
28	E	2.5.1, 3.12, 3.13		

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29	E	2.5.2	<p>Explain why, if no deficiencies exist with the individual accountability for correcting environmental deficiencies, there are so many that recur or remain uncorrected. Review the policy for adequacy.</p> <p>Also, the HWCPP should include a new corrective action plan, as follows: Certification that the facility is operating in full compliance with RCRA and there are no open environmental deficiency related corrective actions will be provided by all Operations, Unit, and Facility managers no later than October 14, 1994. Within one month prior to the certification, a full scope environmental compliance surveillance will have been conducted.</p>	
30	E	3.0	<p>1) This plan still lacks the elements of an implementation plan. It will remain deficient until it explains how the plan will be implemented. 2) Specify which corrective actions are funded and which are not.</p>	
31	E	Table 3.1	<p>Expand the table so it shows <u>all</u> plant areas.</p>	
32	E	3.3	<p>Provide a revised commitment date for having all EPMs and ECs hired. The January 15, 1993, commitment date was missed.</p> <p>1) This section should be revised, so it reads the same as the corrective action plan prepared for the Manager's Issue on Environmental Compliance Ownership and Responsibility (RFO-93-011). 2) First sentence. Describe ownership of areas that are not regulated units, such as, hazardous material or chemical storage areas. EG&G needs to address ownership of chemicals and other materials that may or will become hazardous waste if expired, spilled, left in process lines for over 180 days, etc.</p>	
33	E	3.6	<p>The Memorandum of Understanding is late.</p> <p>1) ¶ 3. It is often inappropriate to implement the Contingency Plan as a precautionary measure unless a spill is imminent. It appears that in most cases, an augmented Spill Prevention Countermeasure and Control (SPCC) plan should be implemented, instead. Review the current corrective action plan to ensure it is adequate. 2) The procedures should also include a discussion of spills of hazardous materials that result in its becoming a solid or hazardous waste. 3) Specifically, what service is Waste Programs providing by assisting the Operations Managers in preparation of the Contingency Plan Implementation Reports that cannot and should not be provided by the ECs and EPMs? What is the value added of Waste Programs involvement? 4) Review all due dates for the corrective actions in this section to ensure they will result in timely and full compliance with the relevant requirements. Assess the impacts of their being so far into the future and the impacts on compliance of waiting for them to be completed.</p>	

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34	E	3.12	1) Some of the performance indicators (PIs) developed to date are of limited value and do not appear to meet the requirements of Item no. 4 of the RFO Ten Point Action Plan. Assess to determine if the Corrective Action Plan that was closed because EG&G claimed they successfully established the PIs should be reopened. 2) The first corrective action plan listed in this section: "Environmental commitments/deficiencies captured in PATS. Completed 2/26/93." was not completed properly, as evidenced by the continuing lack of input of self-valuation deficiencies. This corrective action should be reopened.	
35	E	3.13	See comments under 2.2.2 and 2.3.4.	
36	E	3.14	See comments under 2.2.2	
37	E	3.15	See comments under 2.3.2.	

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Comment

Disposition

38	E	3.16	<p>1) The HWCPP does not adequately address all of the deficiencies involving the RCRA Operating Record. Failure to have adequately identified the requirements for a compliant facility RCRA Operating Record is a serious ongoing programmatic deficiency which must be addressed immediately. The validity and ultimate effectiveness of all corrective action plans, currently being worked or proposed to correct deficiencies with the Operating Record, are dependent upon an identification of the requirements. The Hazardous Waste Requirements Manual (HWRM) should not only establish these requirements, but also identify how the various components (data bases, logs etc.) of the RCRA Operating Record are going to be systematically controlled and managed to ensure sustained sitewide compliance.</p> <p>The due dates do not appear to be responsive since a surveillance of the operating record was completed in 2/93. The plan appears to be deficient in the following areas:</p> <ul style="list-style-type: none"> a. Permit modifications necessary to correct surveillance deficiencies are not defined as corrective actions in the HWCPP. b. The HWCPP does not address the development of procedures and training to provide guidance to plant organizations for the accumulation of recyclable materials. c. The HWCPP should require reassessment of the surveillance recommendations for possible upgrading to findings which must be formally addressed by a corrective action. Recommendations in the EG&G surveillance report regarding the WEMS, liquid waste transfers and inventory, tank records, and preparedness and prevention have sufficient merit to be acted upon. d. The HWCPP should require that the additional surveillances and/or reviews suggested in the surveillance Report be performed. These additional surveillances cover such areas as the Air Emissions Program, the LDR Program, Groundwater monitoring, SWTO and LWTO, the Oxnard Facility and the Administrative Procedures Manual, which contains the implementing requirements for the Emergency Preparedness Program. However, these additional assessments should not be conducted until the requirements for the Operating Record have been defined, incorporated into the HWRM, and implemented plantwide. 	
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Comment No.	Comment Type*	Para. No.	Comment	Disposition
38 cont'd			<p>e. The HWCPP should require that all non-programmatic findings be documented and tracked in PATS. A cursory evaluation of the deficiencies being tracked for these unit specific surveillance numbers identified in Appendix I of the Surveillance Report indicates that all non-programmatic findings are in PATS.</p> <p>f. The HWCPP lists one of the corrective actions as the revision of section 16 of the HWRM to include defining all requirements for the operating record. The plan indicates a scheduled completion date of January 31, 1994, but this date has been rescheduled in PATS to May 30, 1994. The initial due date was very long: justification for the additional time must be provided.</p> <p>2) WEMS - Explain the reason for writing two new procedures instead of revising an existing one. 3) There are and have been ongoing quality control problems with this system. Assess the need for a corrective action plan to address the root cause of these problems.</p>	
39	E	3.17	Provide due dates for all tasks.	

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40	N	3.19	<p>This information in this section is of concern. It appears to describe a continuation of doing business the same way with the operating and program organizations, except there are more people doing the same or very similar functions. Many of the duties that should belong to ECs and EPMs (based on the floor level up program) are now spread out over them and Waste Technical Support. The redundancy between WTS and the ECs and EPMs is highlighted in this section. This section does not demonstrate how EG&G will involve the floor level.</p> <p>The current level of qualifications of some ECs and EPMs may be below the standards needed to meet the NOV settlement compliance due dates. The minimum required level of qualifications, experience, and environmental knowledge for the EC and EPM positions must be reviewed to ensure only highly qualified people are filling or will be appointed to these critically important positions. Also, review the adequacy of the qualification standard package.</p> <p>The schedule for full qualification of ECs is lengthy, and it does not take into account the impacts of personnel turnover. The plan should contain a description of how EG&G ensure compliance in the interim, and a schedule for qualification of the EPMs.</p> <p>Item 1. All areas of RFP must have an EC assigned to assure ownership and responsibility are maintained consistently throughout RFP. Having a WTS representative be contacted for resolution in lieu of having an assigned EC appears to be in conflict with EG&G's recent commitments and corrective action plan on establishing ownership referenced in comment #32.</p> <p>Item 3. What are the criteria for shutting down a building or operation? If they do not exist, modify the corrective action plan to include a task to develop them.</p> <p>Items 1, 2, and 4 all say the same thing: the ECs are supposed to provide advice unless they don't know, at which time they are supposed to contact WTS.</p> <p>Show correct sequence including involvement of the EPMs and combine into one item.</p> <p>Item 4. Status requirements must be the Operations Manager's responsibility, not Waste Surveillance or WTS. Also, inspections must be coordinated by the Operations Manager, not ECs. Operations Managers should also be responsible for providing requested information and documents.</p> <p>Items 7 through 11. The ECs are currently deficient in doing these actions. Corrective action plans should be developed for each of them.</p> <p>Corrective task #4. Revise. Change to " All areas of the plant will have an assigned EC.</p>