

## WCH Environmental Protection and Compliance Policy

*The Washington Closure Hanford (WCH) mission is to remediate and restore portions of the Hanford Site. Thus environmental restoration needs to remain a focal point for all employees whether we drive a truck, purchase or manage materials, oversee systems or work on projects.*

*Workers must be aware of the importance of conformity with the environmental policy and procedures and with the requirements of the Environmental Management System. Training covers the environmental benefits of improved personal performance and potential consequences of departure from specified operating procedures.*

### Overview and Summary

**Washington Closure Hanford (WCH)** is committed to performing work in a compliant manner to protect human health and the environment. WCH will maintain and continually strive for improving environmental awareness, and will take appropriate preventive measures and actions to minimize project impact to the environment. This policy can be summarized and remembered with the acronym "**C2P2**" - **compliance, continuous improvement, and pollution prevention.**

**Within WCH**, the Environmental Compliance and Services (**ECS**) organization helps to ensure protection of workers and the environment, including cultural, historical, and ecological resources. Environmental Services input is needed to guide restoration work amid the many regulations protecting these resources. Current Hanford restoration is primarily in response to the following (as amended):

- Comprehensive Environmental Response, Compensation and Liability Act of 1980
- Resource Conservation Recovery Act of 1976
- Hazardous Waste Management Act of the State of Washington
- Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement).

**WCH is subject to many other treaties**, laws (federal, state and local), regulations and permits. Every person performing work for WCH is responsible for ensuring that their work conforms to all these legal requirements. Remember that we are an environmental company and our success will be measured in our individual and overall stewardship and restoration of resources.

**All project and utilities staff** are at risk if they fail to seek or to follow ECS instructions before disturbing an area. More specifically, involving ECS early in evaluating planned work activities (ground surface or sub-surface disturbances) helps to protect not only the environment, but also the worker, the project, and the company. Without ECS input, field personnel increase their risk of personal injury, lawsuits, potential criminal prosecution, missed schedules, loss of award, loss of trust, increased oversight, and, of course, lasting harm to the environment.

# Environmental Compliance & Services

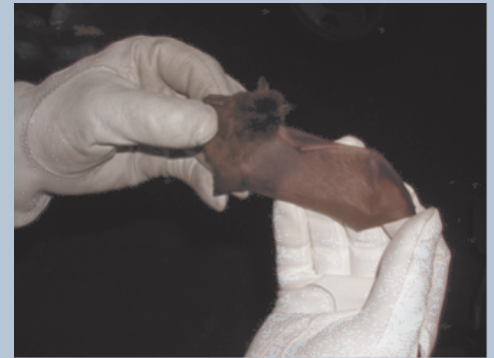


**ECS** reviews and offers specific guidance on proposed activities after conferring with the project. Our mutual goal is to prevent personal injury, minimize environmental impacts, and support Hanford Site remediation and restoration. Essential to meeting this goal is our clear communication on planned projects, on changing priorities, and on lessons learned. In addition to communication within WCH, ECS personnel also maintain important contacts with DOE, federal and state regulatory agencies, and other contractors to keep abreast of changes in environmental regulations. project work are performed by ECS staff in several areas to ensure compliance, safety, and minimal environmental impacts.

**Cultural Reviews:** Cultural Resources evaluates the potential cultural significance of your site and the consequences of your planned project. If the artifacts of prior residents are anticipated, expect to plan for an alternative work proposal or extended delay to the project. Some projects may require Cultural Resources oversight when actively disturbing a site. Discovered artifacts may or may not necessitate an extended work stoppage.



**Ecological Reviews:** Ecological Resources personnel advise on avoiding or minimizing impacts to natural resources due to planned activities. An Ecological Resources review is completed prior to the start of all WCH projects. This review identifies natural resources present on the site and recommendations that minimize impacts. The Ecological Resources evaluation ensures that projects are performed in accordance with DOE management plans, and state and federal laws concerning natural resources.



**Revegetation:** Contractors are required to revegetate areas disturbed by DOE activities. The requirements include goals to stabilize soils to prevent erosion, to establish plant communities dominated by native species, and to ensure high survival rates of replacement shrubs. Revegetation personnel coordinate with the project to leave the sites in a state that will encourage successful habitat succession and meet milestones.



**Geophysics:** The Geophysics Team selects the best technical means to find subsurface obstructions as appropriate to the objectives of each request. To this end they review their records, other historical knowledge, and surface characteristics in light of the planned activity, then conduct field survey activities. Based on the team's interpretation of the survey data, the identified obstructions are communicated to the project.

**Excavation Permits:** The Excavation Permit Coordinator concentrates on ensuring your excavations are safe, timely, cause no unintended property damage and complete their purpose. Once the need to excavate a site is identified, the Excavation Permit Coordinator is contacted with the purpose, boundaries, and details of the activity. Reviewers evaluate the dangers to avoid, and adherence to the resulting Excavation Permit helps to ensure continued safety.



# Environmental Compliance & Services

**Chemical Management:** The Chemical Management Program ensures the safe, compliant and cost-effective stewardship of chemicals. The WCH CMP includes the hazardous chemicals that are inventoried and tracked quarterly within the Chemical Inventory Database, and it does not include waste or radioactive constituents.



**Air Quality:** Air Quality Compliance staff provide technical assistance and help to ensure compliance with air emissions regulations. Contact your

Environmental Project Lead when contemplating an action that may emit radionuclides, criteria/toxic/hazardous air pollutants, ozone depleting substances (refrigerants), or greenhouse gases, or may include asbestos handling or open burning.

**Water Quality:** Several regulations have been issued to minimize the environmental impact from activities conducted in or adjacent to surface water (e.g., the Columbia River). These regulations require permits, regulatory approval, or notifications to be made prior to conducting activities that could affect surface water. Contact your Environmental Project Lead when contemplating an action that may discharge water to the soil or impact the Columbia River.

## Environmentally Preferable Purchasing:

The goals of this program are to reduce or eliminate environmental hazards, conserve environmental resources, minimize life-cycle costs and liability, and maximize operational sustainability. By adhering to the procurement directives regarding recycled-content, bio-based content, and other environmentally preferable products, we will minimize our negative economic and environmental impacts and comply with our contract.

**Spill/Release Prevention:** This program incorporates release and spill prevention through planning and monitoring, as well as through spill response. Equipment is inspected and scheduled for regular maintenance in order to reduce the likelihood of a malfunction that could result in a spill. In the event that a spill occurs, collection and control equipment is available to provide temporary control and prevent releases. Employees must report all leaks, spills or releases to line management immediately.

## WCH Procedural Requirements

**PAS-1-2.1,** Excavation Work and Permitting Requirements

**ENV-1-1.4,** Protection of Natural Resources on the Hanford Site

**ENV-1-1.5,** Protection of Cultural Resources on the Hanford Site

**ENV-1-1.1,** Air Quality

**ENV-1-1.2,** Water Quality

**ENV-1-1.11,** Chemical Management Program

**ENV-1-1.17,** Spill Prevention, Response, and Reporting Protocol

**PAS-1-2.13,** Radioactive Air Emissions

**PAS-1-2.14,** Wastewater Discharges

**PAS-1-2.15,** Control of Ozone-Depleting Substances and Substitutes

**Exhibit J,** (for Subcontractors)



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