

U.S. DEPARTMENT OF ENERGY  
DEPARTMENT-WIDE  
FUNCTIONAL AREA QUALIFICATION STANDARD

# ENVIRONMENTAL COMPLIANCE

Defense Nuclear Facilities Technical Personnel



U.S. Department of Energy  
Washington, D.C. 20585

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## **APPROVAL**

The Federal Technical Capability Panel consists of senior Department of Energy managers responsible for overseeing the Federal Technical Capability Program. This Panel is responsible for reviewing and approving the Qualification Standard for Department-wide application. Approval of this Qualification Standard by the Federal Technical Capability Panel is indicated by signature below.

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Chairman  
Federal Technical Capability Panel

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Author Gould – Savannah River  
Bill Eckroade – DOE-HQ, EH  
Chuck Lewis – DOE-HQ, EH  
Cliff Clark - Hanford  
Dick Cullison - Idaho  
Frank Di Sanza – Las Vegas  
James Elmore – Oak Ridge  
Ken Hoar – Las Vegas  
Leslie A. Monroe – Las Vegas  
Mark Belvin – Oak Ridge  
Paul Dunigan - Hanford  
Wade Whitaker – Savannah River

## **U.S. DEPARTMENT OF ENERGY FUNCTIONAL AREA QUALIFICATION STANDARD**

### **FUNCTIONAL AREA**

Environmental Compliance

### **PURPOSE**

The Department's Federal Technical Capability Program Policy, issued by the Secretary in December 1998, commits the Department to continuously strive for technical excellence. The Technical Qualification Program, along with the supporting technical Functional Area Qualification Standards, complements the personnel processes that support the Department's drive for technical excellence. In support of this goal, the competency requirements defined in the technical Functional Area Qualification Standards should be aligned with and integrated into the recruitment and staffing processes for technical positions. The technical Functional Area Qualification Standards should form, in part, the primary basis for developing vacancy announcements, qualification requirements, crediting plans, interviewing questions, and other criteria associated with the recruitment, selection, and internal placement of technical personnel. Office of Personnel Management minimum qualifications standards will be greatly enhanced by application of appropriate materials from the technical Functional Area Qualification Standards.

The technical Functional Area Qualification Standards are not intended to replace the U.S. Office of Personnel Management's (OPM) Qualifications Standards nor other Departmental personnel standards, rules, plans, or processes. The primary purpose of the Technical Qualification Program is to ensure that employees have the requisite technical competency to support the mission of the Department. The Technical Qualification Program forms the basis for the development and assignment of DOE personnel responsible for ensuring the safe operation of defense nuclear facilities.

### **APPLICABILITY**

The Environmental Compliance Functional Area Qualification Standard establishes common functional area competency requirements for Department personnel who provide assistance, direction, guidance, oversight, or evaluation of contractor technical activities impacting the safe operation of defense nuclear facilities. The technical Functional Area Qualification Standard has been developed as a tool to assist DOE Program and Field offices in the development and implementation of the Technical Qualification Program in their organization. Program and Field offices may choose to use this technical Functional Area Qualification Standard as-is, or they may use parts of it to facilitate the development of their own unique Technical Qualification Standards. In either case, satisfactory and documented attainment of the competency requirements contained in this technical Functional Area Qualification Standard, or similar Standards, ensures environmental compliance personnel possess the requisite competence to fulfill their functional area duties and responsibilities. Office/Facility-Specific Qualification Standards supplement this technical Functional Area Qualification Standard and establish

unique operational competency requirements at the Headquarters or Field element, site, or facility level.

## **IMPLEMENTATION**

This technical Functional Area Qualification Standard identifies the technical competency requirements for environmental compliance personnel. Although there are other competency requirements associated with the positions held by environmental compliance personnel, this Functional Area Qualification Standard is limited to identifying the specific technical competencies. The competency statements define the expected knowledge and/or skill that an individual must meet. Each of the competency statements is further explained by a listing of supporting knowledge and/or skill statements. **The supporting knowledge and/or skill statements are not requirements and do not necessarily have to be fulfilled to meet the intent of the competency.**

The competencies identify a familiarity level, a working level, or an expert level of knowledge; or they require the individual to demonstrate the ability to perform a task or activity. These levels are defined as follows:

**Familiarity level** is defined as basic knowledge of or exposure to the subject or process adequate to discuss the subject or process with individuals of greater knowledge.

**Working level** is defined as the knowledge required to monitor and assess operations/activities, to apply standards of acceptable performance, and to reference appropriate materials and/or expert advice as required to ensure the safety of Departmental activities.

**Expert level** is defined as a comprehensive, intensive knowledge of the subject or process sufficient to provide advice in the absence of procedural guidance.

**Demonstrate the ability** is defined as the actual performance of a task or activity in accordance with policy, procedures, guidelines, and/or accepted industry or Department practices.

Headquarters and Field elements shall establish a program and process to ensure environmental compliance personnel possess the competencies required of their position. That includes the competencies identified in this technical Functional Area Qualification Standard or a similar Standard developed by the organization. Documentation of the completion of the requirements of the Standard shall be included in the employee's training and qualification record.

Equivalencies may be granted for individual competencies based upon an objective evaluation of the employee's prior education, experience, and/or training. Equivalencies shall be granted in accordance with the policies and procedures of the program or field office. The supporting knowledge and/or skill statements, while not requirements, should be considered before granting equivalency for a competency.

Training shall be provided to employees in the Technical Qualification Program that do not meet the competencies contained in the technical Functional Area Qualification Standard.

Departmental training will be based upon appropriate supporting knowledge and/or skill statements similar to the ones listed for each of the competency statements. Headquarters and Field elements should use the supporting knowledge and/or skill statements as a basis for evaluating the content of any training courses used to provide individuals with the requisite knowledge and/or skill required to meet the technical Functional Area Qualification Standard competency statements.

## **EVALUATION REQUIREMENTS**

Attainment of the competencies listed in this technical Functional Area Qualification Standard should be documented by a qualifying official or the immediate supervisor environmental compliance personnel using any of the following methods:

- Documented evaluation of equivalencies
- Written examination
- Documented oral evaluation
- Documented observation of performance

## **DUTIES AND RESPONSIBILITIES**

The following are the typical duties and responsibilities expected of defense nuclear facility technical personnel assigned to the Environmental Compliance Functional Area:

- A. Maintain communication with Headquarters, field elements, regulatory agencies, the public and other stakeholders.
- B. Inform Department of Energy management of applicable environmental compliance project status, activities, and issues.
- C. Plan, observe and evaluate environmental compliance activities and contractor performance to ensure the adequacy and effectiveness of contractor programs such as:
  - Technical performance
  - Plans, policies, and procedures
  - Management controls

- Worker training and qualification programs
  - Occurrence Reporting and Corrective actions
  - Worker and public health and safety programs
  - Environmental protection & regulatory compliance
  - Waste TSD and transportation programs
- D. Develop, review, and assess environmental compliance documentation.
- E. Develop, manage, and assist in the negotiations for regulatory agreements and permits.
- F. Resolve or facilitate the resolution of environmental compliance issues.
- G. Develop, implement, and evaluate environmental compliance strategic, baseline, project, and program plans.
- H. Promote the sharing of information and technology.
- I. Conduct site-specific technology implementation evaluations.
- J. Evaluate the adequacy and effectiveness of Federal and contractor environmental compliance programs to ensure program compliance with Department Orders, standards, guides; Federal regulations, statutes, codes; and applicable state and/or local regulations.

Additional duties and responsibilities specific to the site, the facility, the operational activities, and/or the involved organizations shall be contained in the facility specific qualification standard(s).

## **BACKGROUND AND EXPERIENCE**

The U. S. Office of Personnel Management's Qualification Standards Handbook establishes minimum education, training, experience, or other relevant requirements applicable to a particular occupational series/grade level, as well as alternatives to meeting specified requirements.

The preferred education and experience for environmental compliance personnel is:

1. Education:

Bachelor's degree in engineering or science or meeting the alternative requirements specified for engineers or scientists in the Qualifications Standards Handbook.

2. Experience:

Industrial, military, Federal, State or other directly related background that has provided specialized experience in environmental compliance. Specialized experience can be demonstrated through possession of the competencies outlined in this Standard.

## REQUIRED TECHNICAL COMPETENCIES

Each of the competency statements defines the level of expected knowledge and/or skill that an individual must possess to meet the intent of this Standard. **The supporting knowledge and/or skill statements further describe the intent of the competency statements but are not requirements.**

**Note:** When regulations or Department of Energy directives are referenced in the Qualification Standard, the most recent revision should be used.

### **SCIENTIFIC AND ENGINEERING PRINCIPLES**

#### **Chemistry**

- 1. Environmental compliance personnel shall demonstrate a familiarity level knowledge of chemistry fundamentals.**

##### Supporting Knowledge and/or Skills

- a. Discuss the following types of chemical bonds:
  - Ionic
  - Covalent
  - Metallic
- b. Discuss how elements combine to form chemical compounds.
- c. Define and discuss the following terms:
  - Mixture
  - Solvent
  - Solubility
  - Solute
  - Solution
  - Equilibrium
  - Density
  - Molarity
  - Parts per million (ppm)
  - Acid
  - Base
  - pOH
  - Salt
  - pH

**2. Environmental compliance personnel shall demonstrate a familiarity level knowledge of chemistry fundamentals in the areas of corrosion and water treatment.**

Supporting Knowledge and/or Skills

- a. Explain the process of general corrosion of iron and steel when exposed to water.
- b. Discuss the two conditions that can cause galvanic corrosion.
- c. Discuss the following types of specialized corrosion:
  - Pitting corrosion
  - Stress corrosion cracking
  - Crevice corrosion
- d. Explain the following water treatment processes.
  - Ion exchange
  - pH adjustment
  - Clarification
  - Solids handling
  - Disinfection techniques

***Statistics and Measurements***

**3. Environmental compliance personnel shall demonstrate a familiarity level knowledge of solving problems involving probability and simple statistics.**

Supporting Knowledge and/or Skills

- a. State the definition of the following statistical terms:
  - Mean
  - Variance
  - Standard deviation of the mean
  - Median
  - Mode
  - Standard deviation
- b. Explain the structure and function of distributions.
- c. Calculate the mathematical mean of a given set of data.
- d. Calculate the mathematical standard deviation of the mean of a given set of data.

- e. Given the data, calculate the probability of an event.
- f. Describe how measures of samples (i.e., measures of central tendency and variability) are used to estimate population parameters through statistical inference.
- g. Discuss Type I and Type II decision errors and the relationship to sampling and confidence levels.

### ***Hydrology, Geology, and Soil Science***

#### **4. Environmental compliance personnel shall demonstrate a familiarity level knowledge of the basic principles and concepts of hydrology, geology, and soil science.**

##### Supporting Knowledge and/or Skills

- a. List the different soil textures (compositions) and soil structures.
- b. Define humus and explain its role in chemical reactions in the soil.
- c. Define erosion and describe the characteristics and effects of water and wind erosion.
- d. Describe the following processes and explain how water and soil interact in each:
  - Infiltration and percolation
  - Groundwater recharge
  - Runoff
  - Evapotranspiration
- e. Describe how soil characteristics, slope factors, and land cover conditions impact the detachment and transport processes of pollution.
- f. Discuss pollutant loading and the pollutant delivery ratio.
- g. Discuss the use of soil survey maps.
- h. Discuss the cation and anion exchange capacity of soils.
- i. Describe the hydrologic cycle.
- j. Define the following hydrologic terms and describe the relationships between them:
  - Precipitation
  - Stream flow
  - Evaporation

- Transpiration
  - Subsurface water
  - Sedimentation
- k. Define the following groundwater terms and describe the relationships between them:
- Capillary water
  - Zone of saturation
  - Specific yield
  - Hydraulic conductivity
  - Transmissivity
  - Vadose zone
- l. Define the following surface water terms:
- Mass curve
  - Frequency analysis
- m. Discuss the composition and identification of the following types of rocks and cite examples of each.
- Igneous
  - Sedimentary
  - Metamorphic
- n. Describe the geometry and properties of the following rock masses:
- Folds
  - Faults
  - Structural Discontinuities
  - Residual Stress
  - Sheet Joints
  - Structural discontinuities
  - Shear strength of discontinuities
  - Residual stress
  - Sheet joints
- o. Discuss the use of geological and geotechnical maps.
- p. Describe the geologic considerations, criteria and procedures used to evaluate the following areas of topography:
- Relief
  - Slope stability

- Flood plains
  - Karst terrain
- q. Discuss weathering and its significance in geotechnical engineering.
  - r. Discuss tests that assess weatherability.
  - s. Discuss the process for logging rock cores.
  - t. Discuss how contaminant movement relates to soil density.

### ***Meteorology***

#### **5. Environmental compliance personnel shall demonstrate a familiarity level knowledge of the basic principles and concepts of meteorology.**

##### Supporting Knowledge and/or Skills

- a. Discuss the properties of high pressure and low pressure systems and their impact on air pollution.
- b. Discuss the following horizontal dispersion terms:
  - Wind rose
  - Pollution rose/plume meander
- c. Describe the role of lapse rate in determining dispersion coefficients.
  - Dry adiabatic lapse rate
  - Prevailing lapse rate
  - Neutral lapse rate
  - Subadiabatic lapse rate
  - Weak lapse rate
  - Inversion
  - Superadiabatic lapse rate
- d. Describe the classes of atmosphere stability, including inversions.
- e. Describe the kind of information given by a wind rose and pollution rose.

### ***Environmental Biology***

#### **6. Environmental compliance personnel should demonstrate a familiarity level knowledge of the basic terms and concepts of environmental biology.**

##### Supporting Knowledge and/or Skills

- a. Define the following terms:
  - . Ecosystem
  - . Habitat
  - . Species
  - . Pathways analysis
  - . Bioaccumulation
  - . Bioconcentration
  - . Biotoxicity
  - . Biodiversity
- b. Discuss how synergism makes it difficult to establish a cause and effect relationship between pollutants and disease.

### ***Engineering Drawings***

#### **7. Environmental compliance personnel shall demonstrate a working level knowledge of engineering drawings.**

##### Supporting Knowledge and/or Skills

- a. Given an engineering print, read and interpret the information contained in the title block, the notes and legend, the revision block, and the drawing grid.
- b. Identify the symbols used on engineering P&IDs for:
  - . Types of valves and actuators
  - . Basic types of instrumentation.
  - . Types of instrument signal controllers and modifiers
  - . Types of system components (pumps, etc.)
  - . Types of lines
- c. Identify the symbols used on engineering P&IDs to denote the location of instruments, indicators, and controllers.
- d. Identify how valve conditions are depicted.
- e. Determine system flowpath(s) for a given valve lineup.

### ***Heat Transfer, Fluid Flow and Thermodynamics***

#### **8. Environmental compliance personnel shall demonstrate a familiarity level knowledge of basic thermodynamics concepts and theories.**

##### Supporting Knowledge and/or Skills

- a. Define the following terms:
    - Specific volume
    - Density
    - Specific gravity
    - Mass
    - Weight
  - b. Describe the relationship between absolute pressure, gauge pressure, and vacuum.
  - c. Define the following and describe their relationship:
    - Energy
    - Potential Energy
    - Kinetic Energy
    - Work
    - Heat
  - d. Describe the following types of thermodynamic systems:
    - Isolated system
    - Open system
    - Closed system
  - e. Using the ideal gas law discuss the relationship between pressure, temperature, and volume.
  - f. Describe the effects of pressure and temperature changes on confined fluids.
  - g. Describe how the density of a fluid varies with temperature.
  - h. Define the term buoyancy.
  - i. Describe the relationship between the pressure in a fluid column and the density and depth of the fluid.
  - j. Define the property of viscosity.
  - k. Define the term head, head loss, and frictional loss, with respect to its use in fluid flow.
- 9. Environmental compliance personnel shall demonstrate a familiarity level knowledge of evaluating technologies.**
- a. Discuss the Department's policies and procedures for screening technologies.

- b. Describe the process for performing an analysis of alternative environmental compliance options.

**10. Environmental compliance personnel shall demonstrate a working level knowledge of problem analysis principles and techniques necessary to identify problems, determine potential causes of the problems, and identify corrective actions(s).**

Supporting Knowledge and/or Skills

- a. Describe and explain the application of problem analysis techniques including the following:
  - Root Cause Analysis
  - Causal Factor Analysis
  - Change Analysis
  - Barrier Analysis
  - Management Oversight Risk Tree Analysis
- b. Describe and explain the application of the following Root Cause Analysis processes in the performance of occurrence investigations:
  - Events and Causal Factors Charting
  - Root Cause Coding
  - Recommendation Generation
- c. Compare and contrast Type A, Type B, and Type C investigations and discuss an example of the application of each.
- d. Explain the necessity for and differences between the immediate, short term, and long term actions taken as the result of a problem identification or occurrence.
- e. Explain and apply problem analysis techniques to the identification of potential problems and/or the prevention of problems. Include data gathering techniques and the use of trending/history in your explanation.
- f. Participate in a contractor problem analysis and critique the results.

**OPERATIONAL KNOWLEDGE**

***Environmental Monitoring***

**11. Environmental compliance personnel shall demonstrate a working level knowledge of Department of Energy (DOE) Order 5400.1, General Environmental Protection Program.**

Supporting Knowledge and/or Skills

- a. State the purpose of DOE Order 5400.1, General Environmental Protection Program.
  - b. Define the following terms:
    - Effluent
    - Environmental Monitoring
    - Environmental Protection Standard
    - Effluent Monitoring
    - Environmental Surveillance
    - Environmental Occurrence
    - Waste Minimization
  - c. Discuss the Department's policy pertaining to the environmentally safe and sound operation of its facilities.
  - d. Discuss the Department's policy pertaining to the minimization of waste.
  - e. Discuss the requirements for Notification and Reports. Include the following as a minimum:
    - Notification of Environmental Occurrences to EH-1
    - Office of Management and Budget Circular A-106
    - Annual Site Environmental Report
    - Reports on Radioactive/Effluent/On-Site Discharge/Unplanned Releases
  - f. Discuss the requirements for Environmental Protection Program. Include the following as a minimum:
    - Implementation Plan
    - Long Range Environmental Protection Plan
    - Special Program Planning Requirements
  - g. Discuss the requirements for Environmental Monitoring. Include the following as a minimum:
    - Preoperational monitoring of facilities, sites, and operations
    - Environmental monitoring plans
    - Environmental monitoring - general requirements
    - Meteorological monitoring program
    - Radiological and non-radiological monitoring
    - Groundwater monitoring program
- 12. Environmental compliance personnel shall demonstrate a working level knowledge of monitoring techniques related to environmental compliance.**

Supporting Knowledge and/or Skills

- a. Describe the types of equipment used to monitor a site for the following:
  - . Ambient air quality
  - . Emissions
  - . Groundwater contamination
  - . Meteorological factors
  - . Streams and rivers contamination
  - . Soil and sediment contamination
  - . Wildlife contamination
- b. Describe the requirements of the following documents as they relate to environmental monitoring:
  - . 10 CFR 61.53, Environmental Monitoring
  - . Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)
  - . Resource Conservation and Recovery Act (RCRA)
  - . National Environmental Policy Act (NEPA)
  - . 40 CFR 136, Analytical Test Procedures
  - . 40 CFR 61, NESHAPs
- c. Describe the various quality assurance and quality control programs used to enhance data quality. Include in your discussion programs both internal and external to the Department.
- d. Describe the standard methods for the examination of water and wastewater.
- e. Given a sampling parameter/equipment, describe the standard sampling methods and protocols.

**13. Environmental compliance personnel shall demonstrate a working level knowledge of the purpose and uses of environmental sampling and monitoring equipment.**

Supporting Knowledge and/or Skills

- a. Explain the reason for measuring emissions, meteorological factors and ambient air quality under various operation conditions (e.g., routine and emergency).
- b. Describe the purpose and limitations of the following air quality measurement instruments.
  - . High volume particulate sampler
  - . Liquid bubbler (e.g., for sulfur dioxide)
  - . Infrared spectrometer

- c. Describe the purpose and types of material collected by the following sampling media:
  - . High efficiency glass fiber filter
  - . Activated charcoal cartridge
  - . Silica gel
- d. Describe the purpose for measuring each of the following parameters during field surveys of water quality:
  - . Temperature
  - . Dissolved oxygen
  - . Conductivity
  - . pH
- e. Discuss the factors that can affect readings and the preservation methods for the field measurements listed above.
- f. Describe how trace toxic organics in water are assayed by gas chromatography.
- g. Describe how heavy metals in water are measured using atomic absorption spectrophotometry.
- h. Describe how volatile organics are measured.

## ***INTEGRATED SAFETY MANAGEMENT***

### **14. Environmental compliance personnel shall demonstrate a working knowledge of the purpose and requirements of DOE P 450.4, Safety Management Policy.**

#### Supporting Knowledge and/or Skills

- a. Describe the purpose, scope, and application of the requirements detailed DOE P 450.4, Safety Management Policy.
- b. Describe the Integrated Safety Management System (ISMS) Objective.
- c. List and explain the five core functions set forth in the Safety Management System policy.
- d. List and explain the seven guiding principles of the Safety Management System policy, including their relationship to the five core functions of the Safety Management System policy.

- e. Given the Integrated Safety Management System (ISMS) guide discuss the process for tailoring the ISMS to environmental compliance activities, including both DOE and contractor responsibilities in the tailoring process.
- f. Using the ISMS Guide, prepare an action plan which adequately outlines interviews and observations, and details documents to review during an evaluation of contractor compliance with the requirements of DOE P 450.4, Safety Management Policy.
- g. Using the ISMS Guide, evaluate contractor compliance with the requirements of DOE P 450.4, Safety Management Policy. During this evaluation, demonstrate the ability to properly conduct interviews, observations, and document reviews.
- h. Given data from an evaluation, analyze the results of the evaluation to determine contractor compliance or noncompliance of the requirements.
- i. Given the results from an analysis of contractor compliance or noncompliance, document the results and communicate the results to contractor and Department line management.

### ***Industrial Safety***

- 15. Demonstrate working-level knowledge of the Occupational Safety and Health Act (OSHA) requirements in the following documents:**
- **DOE Order 440.1A, Worker Protection Management for DOE Federal and Contractor Employees**
  - **29 CFR 1910, Occupational Safety and Health Standards**
  - **29 CFR 1926, Safety and Health Regulations for Construction**

#### Supporting Knowledge and/or Skills

- a. Discuss the application and impact of OSHA on Department projects.
- b. Identify the requirements in the OSHA that form the basis of authority for project management personnel in the oversight and management of a project.
- c. Discuss the project manager responsibilities set forth in DOE Order 440.1A, Worker Protection Management for DOE Federal and Contractor Employees.
- d. Discuss the construction contractor's responsibilities under DOE 440.1A, Worker Protection Management for DOE Federal and Contractor Employees:
  - Establishing a safety program
  - Worksite presence during work activities
  - Compliance by subcontractors

- e. Discuss the requirements for the performance of a hazard analysis and a hazard abatement/prevention program. Include in the discussion each of the following elements:
  - Responsibility for implementation
  - Purpose and content of the hazard analysis
  - Worker awareness of the hazards and hazard abatement/prevention program
- f. Discuss the contractor's responsibility for providing necessary training to employees in the area of safety and health on the worksite.
- g. Discuss the project manager's responsibility for on-site safety and health inspections.
- h. Discuss the contractor's required response to an identified safety and/or health hazard.

**16. Environmental Compliance personnel shall demonstrate a working level knowledge of the requirements for the use of personal protective equipment.**

Supporting Knowledge and/or Skills

- a. Describe the principles governing the selection, use, and limitations of the following:
  - Respirators
  - Protective clothing
- b. Describe the various types of equipment (devices or clothing) worn to protect a worker from exposure to hazardous substances and physical injury.
- c. Given a work procedure and atmospheric conditions, identify the appropriate type of respiratory protection for the activity.
- d. Describe the four levels of protection for workers at hazardous waste sites or for those workers conducting emergency response activities as defined by the Environmental Protection Agency.

**17. Environmental compliance personnel shall demonstrate a familiarity level knowledge of the safety-related requirements for hazardous substances.**

Supporting Knowledge and/or Skills

- a. Discuss the hazards associated with the use of corrosives (acids and alkalies).
- b. Describe the general safety precautions necessary for the handling, storage, and disposal of corrosives.
- c. Discuss the general safety precautions regarding toxic compounds.

- d. Describe the criteria used to determine if a compound is a health hazard and discuss the methods by which toxic compounds may enter the body.
- e. Discuss the general safety precautions regarding the use, handling, and storage of compressed gases, including specifically hydrogen, oxygen, and nitrogen.
- f. Discuss the safety precautions for working with cryogenic liquids.
- g. Explain the difference between a flammable liquid and a combustible liquid.
- h. Describe the general safety precautions regarding the use, handling, and storage of flammable and combustible liquids.
- i. Discuss the use of Material Safety Data Sheets.

**18. Environmental Compliance personnel shall demonstrate a working level knowledge of hazardous waste operations and their impact on worker safety and health.**

Supporting Knowledge and/or Skills

- a. Describe the industrial process associated with hazardous waste operations as they pertain to Environmental compliance.
- b. Explain the personnel hazards associated with the following:
  - Polychlorinated Biphenyls (PCB) removal
  - Asbestos disposal
  - Biological hazards
  - Solvents
  - Paint removal
  - Waste oil
  - Solid waste
  - Mixed waste
  - Hazardous waste

**19. Environmental compliance personnel shall demonstrate a working level knowledge of the principles, concepts, and requirements of environmental risk assessment.**

Supporting Knowledge and/or Skills

- a. Define risk assessment, risk management, and risk communication.
- b. Describe the four steps of a risk assessment.
- c. Describe how risk assessment helps in site decision-making.

- d. Define the term "Baseline Risk Assessment."
- e. Describe the process for a Toxicity Assessment.
- f. Describe the process for an Exposure Assessment.
- g. Describe the process used to characterize risk.

**20. Environmental compliance personnel shall demonstrate a familiarity level knowledge of 29 CFR 1910.96, Ionizing Radiation, 29 CFR 1910.97, Non-Ionizing Radiation and Department of Energy (DOE) Order 5480.11, Radiation Protection for Occupational Workers.**

Supporting Knowledge and/or Skills

- a. Compare and contrast the dose equivalencies between a REM and other dose units.
- b. Given appropriate data, classify an area as either a "restricted area" or an "unrestricted area" and state the reasons for the classification.
- c. Discuss the requirements related to the exposure of individuals to radiation in restricted areas, include any applicable dose limits.
- d. Discuss the requirements related to the exposure of individuals to airborne radioactive material, include any applicable precautionary measures and personal monitoring requirements.
- e. Discuss the requirements for posting the various types of radiation areas, include the requirements for exceptions to the posting requirements.
- f. Discuss the requirements for exemptions for radioactive materials packaged for shipment.
- g. Discuss the requirements related to notification of incidents.
- h. Compare and contrast the terms "non-ionizing radiation" and "ionizing radiation."

**21. Environmental Compliance personnel shall demonstrate a familiarity level of knowledge of the purpose and requirements of DOE O 5400.5, Radiation Protection of the Public and Environment.**

Supporting Knowledge and/or Skills

- a. State the Department's policy and discuss the objectives regarding the protection of the public and the environment from radiation as contained in DOE O 5400.5.

- b. Define the following terms:
- As low as reasonably achievable (ALARA)
  - Best available technology (BAT)
  - Derived concentration guide (DCG)
  - Absorbed dose
  - Collective dose equivalent
  - Collective effective dose equivalent
  - Committed dose equivalent
  - Committed effective dose equivalent
  - Deep dose equivalent
  - Dose equivalent
  - Effective dose equivalent
  - Public dose
  - Weighting factor
  - Quality factor
  - Effluent monitoring
  - Environmental surveillance
  - Protective action guides
  - Release of property
  - Residual radioactive material
  - Settleable solids
  - Soil column
- c. List and discuss the factors that must be considered pertaining to the release of materials and equipment having residual radioactive material as outlined in Chapter IV, Residual Radioactive Material Cleanup.
- d. Identify and discuss the release criteria for:
- soil
  - air/water
  - surface
  - real property

## **AUTHORIZATION BASIS DOCUMENTATION**

### **22. Environmental Compliance personnel shall demonstrate a familiarity level of knowledge of DOE O 5480.21, Unreviewed Safety Questions.**

#### Supporting Knowledge and/or Skills

- a. Discuss the reasons for performing an unreviewed safety question determination.

- b. Define the following terms:
  - Accident analyses
  - Safety evaluation
  - Technical safety requirements
- c. Describe the situations which require a safety evaluation to be performed.
- d. Define the conditions for an unreviewed safety question.
- e. Describe the responsibilities of contractors authorized to operate defense nuclear facilities for the performance of safety evaluations.
- f. Describe the action(s) to be taken by a contractor upon identifying information that indicates a potential inadequacy of previous safety analyses or a possible reduction in the margin of safety as defined in the technical safety requirements.
- g. Discuss the action(s) to be taken if it is determined that an unreviewed safety question is involved.
- h. Discuss the qualification and training requirements for personnel who perform safety evaluations.

**23. Environmental Compliance personnel shall demonstrate working-level knowledge of the technical safety requirements as described in DOE O 5480.22, Technical Safety Requirements.**

Supporting Knowledge and/or Skills

- a. Discuss the purpose of technical safety requirements.
- b. Describe the responsibilities of contractors authorized to operate defense nuclear facilities for technical safety requirements.
- c. Define the following terms and discuss the purpose of each:
  - Safety limit
  - Limiting control settings
  - Limiting conditions for operation
  - Surveillance requirements
- d. Describe the general content of each of the following sections of the technical safety requirements:
  - Use and application
  - Safety limits

- Operating limits
  - Surveillance requirements
  - Administrative controls
  - Design features
- e. Discuss the possible source documents that may be used in developing technical safety requirements.
- f. Discuss the conditions that constitute a violation of the technical safety requirements and state the reporting requirements should a violation occur.

**24. Environmental Compliance personnel shall demonstrate working-level knowledge of DOE O 232.1, Occurrence Reporting and Processing of Operations Information.**

Supporting Knowledge and/or Skills

- a. State the purpose of the Order.
- b. Define the following terms:
- Event
  - Condition
  - Facility
  - Notification report
  - Occurrence report
  - Reportable occurrence
- c. Discuss the Department's policy regarding the reporting of occurrences as outlined in the Order.
- d. State the different categories of reportable occurrences and discuss each.
- e. Refer to Attachment 1 to DOE O 232.1, Occurrence Reporting and Processing of Operations Information, and discuss the role of Environmental Compliance in environmental compliance-related reportable occurrences.

**FUNCTIONAL AREA SPECIFIC**

- 25. Environmental compliance personnel shall demonstrate a working level knowledge of the following Department of Energy (DOE) Orders:**
- **DOE O 450.1, General Environmental Protection Program**
  - **DOE O 231.1, Environmental Safety and Health Reporting**

Supporting Knowledge and/or Skills

- a. Discuss the relationship between Comprehensive Environmental Response, Compensation, and Liability Act and DOE O 450.1, General Environmental Protection Program.
- b. Describe the requirements, deadlines and update frequency for the following Plans mandated by DOE O 450.1, General Environmental Protection Program:
  - Environmental Protection Implementation Plan
  - Groundwater Protection Management Program
  - Long-range Environmental Protection Plan
  - Waste Minimization Plan
  - Pollution Prevention Program
  - Environmental Monitoring Plan
  - Pollution Abatement Projects 5-year Plan
- c. Explain the environmental compliance Issue reporting requirements as outlined in DOE O 231.1, Environmental Safety and Health Reporting.

***Environmental Laws and Regulations***

**26. Environmental compliance personnel shall demonstrate a working level knowledge of the Clean Air Act (CAA) and implementing regulations.**

Supporting Knowledge and/or Skills

- a. Discuss the application of the Clean Air Act to the Department of Energy or its facilities.
- b. Identify the National Ambient Air Quality Standards (primary and secondary) and the National Emission Standards for Hazardous Air Pollutants (NESHAP).
- c. Describe the requirements for permitting, monitoring and reporting prescribed in the regulations that implement Title V of the Clean Air Act.
- d. Describe the prevention of significant deterioration (PSD) regarding the requirements established by the Clean Air Act.
- e. Discuss the modeling requirements for monitoring and close calculation air dispersion in the National Emissions Standards for Hazardous Air Pollutants, Standards for Radionuclides.
- f. Identify the major sources and emission limitations per the Clean Air Act, Title I.
- g. Discuss the New Source Performance Standards (40 CFR 60).

- h. Discuss the potential liabilities of the Department of Energy and its contractors inherent in the enforcement of environmental regulations (i.e., compliance orders, enforcement actions, fines and penalties, and provisions for civil suits).
- i. Discuss the National Emissions Standards for Hazardous Air Pollutants air emission limits.
- j. Describe the Clean Air Act, Title V, Stratospheric Ozone Protection criteria.
- k. Discuss the requirements for control technologies specified in the Clean Air Act and the purpose and function of various air pollutant abatement technologies.
- l. Describe the four basic classes of air pollutant abatement/control technologies specified in the Clean Air Act.
- m. Describe, in general, the purpose and function of various pollution abatement equipment/technologies.
  - Cyclones
  - Baghouse
  - Electrostatic precipitator
  - Thermal oxidizer
  - Scrubber
  - Adsorption

**27. Environmental compliance personnel shall demonstrate the ability to appraise the contractor's program(s) and/or permits to assess compliance with the requirements for the environmental medium of air.**

Supporting Knowledge and/or Skills

- a. Given a proposed permit application, evaluate the requirements, including monitoring and reporting, established by the regulations that implement the Clean Air Act.
- b. Given an existing or proposed permit application, verify compliance with requirements in the regulations that implement the Clean Air Act for the prevention of significant deterioration (PSD).
- c. Given a permitted source, conduct an assessment to verify compliance with the emission limitations per the Clean Air Act, Title I.
- d. Given a proposed permit, verify that the administrative controls are in place/planned to establish acceptable limits of air quality.

- e. Given an air permit or a permit application, evaluate the source against the operating conditions in the permit or the permit application.
- f. Given an existing permitted source, evaluate the source's future operating requirements in terms of the constraints imposed by their current permit.
- g. Given a proposed source, evaluate the source for all present applicable Federal and state regulations

**28. Environmental compliance personnel shall demonstrate a working level knowledge of the following laws and regulations as related to the environmental medium of water:**

- **Clean Water Act (CWA)**
- **Safe Drinking Water Act (SDWA)**
- **Resource Conservation and Recovery Act (RCRA) (groundwater provisions)**
- **National Groundwater Protection Policy (NGPP)**
- **Oil Pollution Act**
- **Rivers and Harbors Act (RHA)**

Supporting Knowledge and/or Skills

- a. Discuss the application of the above laws and regulations to the Department of Energy and its facilities.
- b. Describe water quality criteria and stream use classification identified in the Clean Water Act.
- c. Discuss the Clean Water Act permitting requirements including monitoring and reporting. Include in the discussion, National Pollutant Discharge Elimination System Program and the Rivers and Harbors Act Dredge/Fill material permits.
- d. Describe the reporting requirements identified in the Clean Water Act.
- e. Discuss the standards for maximum contaminant levels (primary and secondary) contained in the Safe Drinking Water Act.
- f. Describe the provisions for notification to consumers as outlined by the Safe Drinking Water Act.
- g. Discuss the Safe Drinking Water Act Underground Injection Control Program.
- h. Discuss the Safe Drinking Water Act permitting requirements.
- i. Describe the aquifer protection (sole source) regulations of the Safe Drinking Water Act.

- j. Discuss the cross-connection identification/elimination and back-flow prevention regulations described in the Safe Drinking Water Act.
- k. Describe the groundwater protection requirements applicable to interim status Resource Conservation and Recovery Act's (RCRA) facilities in RCRA's implementing regulations, Subpart F of 40 CFR 265.
- l. Describe the groundwater protection requirements applicable to permitted Resource Conservation and Recovery Act (RCRA) facilities in RCRA's implementing regulations, Subpart F of 40 CFR 264 and in the facility's permit.
- m. Discuss the potential liabilities of the Department of Energy and its contractors inherent in the enforcement of environmental regulations (i.e., compliance orders, enforcement actions, fines and penalties, and provisions for civil suits).
- n. Discuss the storm water management aspects of the National Pollutant Discharge Elimination Standard (NPDES).
- o. Describe the radiological liquid effluent requirements established in DOE O 5400.5, Radiation Protection of the Public and the Environment, and 10 CFR Part 834, Radiation Protection of the Public and Environment.
- p. Explain the spill prevention and control requirements of the Clean Water Act (40 CFR 109-114).

**29. Environmental compliance personnel shall demonstrate the ability to appraise the contractor's program(s) and/or permits to assess compliance with the requirements for the environmental medium of water.**

Supporting Knowledge and/or Skills

- a. Given a proposed permit, verify that the Water Quality Criteria and Stream Use Classification as identified in the Clean Water Act has been correctly applied.
- b. Review the contractor's program for compliance with the Clean Water Act's reporting requirements.
- c. During an assessment of an existing facility, verify that the pre-treatment standards contained in the Clean Water Act are being met.
- d. During an assessment of the contractor's sampling and monitoring program, verify that the standards for maximum contaminant levels (primary and secondary) provided by the Safe Drinking Water Act are being met.

- e. Conduct an assessment of the contractor's program to verify that the Safe Drinking Water Act provisions for notification to consumers have been established.
- f. Perform an assessment of underground injection procedures and monitoring, and assess for compliance with the restrictions and controls provided by the Safe Drinking Water Act.
- g. Conduct an assessment to ensure the contractor's program is in compliance with the Standard Methods for the examination of water and wastewater or other acceptable protocol as detailed in 40 CFR 136, Analytical Test Procedures.
- h. Review the contractor's program(s) for adequate provisions to ensure that the cross-connection identification/elimination and back-flow prevention is as described by the Safe Drinking Water Act.
- i. Prior to closure of a permit, review it for compliance with the Resource Conservation and Recovery Act requirements for groundwater protection.

**30. Environmental compliance personnel shall demonstrate a working level knowledge of the implementation of the regulations and requirements of the National Environmental Policy Act (NEPA).**

Supporting Knowledge and/or Skills

- a. Explain the purpose and scope of the Council on Environmental Quality regulations implementing the National Environmental Policy Act (40 CFR 1500-1508).
- b. Discuss the purpose and scope of DOE O 451.1A, National Environmental Policy Act Compliance Program.
- c. Describe the public participation process.
- d. Discuss the integration of consultation requirements under other environmental legislation (e.g., National Environmental Policy Act and Endangered Species Act and Fish and Wildlife Coordination Act).
- e. Discuss the content and procedures specified by the Department implementing regulations 10 CFR 1021, Compliance with the National Environmental Policy Act and Secretarial Policy on the National Environmental Policy, June 13, 1994.
- f. Participate in the preparation of the documents listed below.
  - Environmental Impact Statement (EIS)
  - Environmental Assessment (EA)
  - Finding Of No Significant Impact (FONSI)
  - Categorical Exclusion (CX)

- Record of Decision (ROD)

**31. Environmental compliance personnel shall demonstrate the ability to review and assess the following National Environmental Policy Act documentation:**

- Environmental Impact Statement (EIS)
- Environmental Assessment (EA)
- Finding Of No Significant Impact (FONSI)
- Categorical Exclusion (CX)
- Record of Decision (ROD)

Supporting Knowledge and/or Skills

- a. Discuss the requirements for each document and describe the process for reviewing the above listed documents.
- b. Describe the process for performing an assessment of the above listed documents and discuss criteria that could be used during an assessment.
- c. Perform a written review/assessment of each of the above listed documents.
- d. Discuss the relationship between 40 CFR 1500, Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act, and DOE O 451.1A, National Environmental Policy Act Compliance Program.

**32. Environmental compliance personnel shall demonstrate a working level knowledge of the following laws, regulations, and Department of Energy Orders as related to environmental radiation:**

- Atomic Energy Act
- 10 CFR 834, Radiation Protection of the Public and Environment
- 40 CFR 61 Subpart H, National Emission Standards for Hazardous Air Pollutants
- 40 CFR 141, National Primary Drinking Water Regulations
- DOE O 5400.1, General Environmental Protection Program
- DOE O 5400.5, Radiation Protection of the Public and the Environment
- DOE O 5820.2A, Radioactive Waste Management
- 40 CFR 122, EPA Administered Permit Programs: The National Pollutant Discharge Elimination System

Supporting Knowledge and/or Skills

- a. Discuss the application of the above listed documents to the Department of Energy and its facilities.

- b. Define the following terms and their implications for regulation in the Department of Energy:
  - Source material
  - Special nuclear material
  - Byproduct material
  - Naturally occurring or accelerator-produced radioactive material
- c. the major requirements of 10 CFR 834, Radiation Protection of the Public and Environment.
- d. Describe the concept of Reportable Quantity and identify that quantity for a given radionuclide.
- e. Describe the system for classifying mixed waste and the general requirements for treatment, storage and disposal.
- f. Describe the basic monitoring and reporting requirements of radionuclides in National Emissions Standards for Hazardous Air Pollutants and state the dose limit.
- g. Describe the basic limits for radionuclides in drinking water and their application to Department operations.
- h. Describe the following types of radioactive waste and the associated requirements:
  - Low-level waste
  - High-level waste
  - Transuranic waste
  - Spent nuclear fuel
  - Uranium mine and mill tailings
- i. Discuss the potential liabilities of the Department and its contractors inherent in the enforcement of environmental regulations (i.e., compliance orders, enforcement actions, fines and penalties, and provisions for civil suits).

**33. Environmental compliance personnel shall demonstrate a working level knowledge of the supporting environmental laws and regulations including:**

- **Pollution Prevention Act (PPA)**
- **Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)**
- **Toxic Substances Control Act (TSCA)**
- **Endangered Species Act (ESA)**
- **Comprehensive Environmental Response, Compensation & Liability Act/Superfund Amendments and Reauthorization Act (Superfund)**
- **Emergency Planning and Community Right-to-Know Act (EPCRA)**

- **Atomic Energy Act**
- **Federal Facility Compliance Act (FFCA)**
- **Biohazard (CFR 1910.1030&1910.145)**
- **Comprehensive Environmental Response Facilitation Act**

Supporting Knowledge and/or Skills

- a. Describe the deadlines identified in the Pollution Prevention Act.
- b. Identify the disciplines/areas in which Pollution Prevention Act applies.
- c. Describe the process for licensing applicators as defined in the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA).
- d. Discuss the purpose and history of Comprehensive Environmental Response, Compensation, and Liability Act/Superfund Amendments and Reauthorization Act (Superfund).
- e. Explain how the Reportable Quantities (RQ) specified by Comprehensive Environmental Response, Compensation, and Liability Act are applied.
- f. Describe the removal/cleanup actions required by Comprehensive Environmental Response, Compensation, and Liability Act/Resource Conservation and Recovery Act.
- g. Discuss the requirements for the following documents:
  - Site Evaluation
  - Remedial Investigation
  - Baseline Risk Assessment
  - Feasibility Study
  - Proposed Plan
  - Remedial Design
  - Remedial Action
- h. Discuss the interface/coordination with Environmental Restoration efforts required by Comprehensive Environmental Response, Compensation, and Liability Act/Resource Conservation and Recovery Act.
- i. Describe the application of the Emergency Planning and Community Right-to-Know Act to Department facilities (e.g., Toxic Release Inventory and coordination requirements with local emergency planning committees).
- j. Describe the following types of waste defined by the Atomic Energy Act:
  - High level
  - Transuranic

- . Low level
  - . By-product material
  - . Special nuclear material
  - . Source material
- k. Discuss the Endangered Species Act consultation requirements.
- l. Discuss the marking of PCS and PCB items required by the Toxic Substances Control Act.
- m. Describe how the Federal Facilities Compliance Act will impact Department compliance actions.
- n. Discuss the potential liabilities of the Department and its contractors inherent in the enforcement of environmental regulations (i.e., compliance orders, enforcement actions, fines and penalties, and provisions for civil suits).
- o. Conduct an appraisal to assess compliance with polychlorinated biphenyls (PCB) waste management activities according to the Toxic Substances Compliance Act (TSCA).

**34. Environmental compliance personnel shall demonstrate a working level knowledge of the management and negotiation of regulatory agreements and permits.**

Supporting Knowledge and/or Skills

- a. Describe the responsibilities involved with the management of the following documents:
- . National Pollutant Discharge Elimination System Permit
  - . Federal Facility Agreement
  - . Consent Orders & Settlement Agreements
  - . Record Of Decision
  - . Resource Conservation and Recovery Act Part B Permit
  - . Grant conditions
  - . Site Treatment Plan
- b. Discuss the requirements and methods of negotiation for the following documents:
- . National Pollutant Discharge Elimination System Permit
  - . Federal Facility Agreement
  - . Consent Order & Settlement Agreements
  - . Record Of Decision
  - . Resource Conservation and Recovery Act Part B Permit
  - . Grant conditions

- . Site Treatment Plan

**35. Environmental compliance personnel shall demonstrate a familiarity level knowledge of how environmental laws and regulations are enforced.**

Supporting Knowledge and/or Skills

- a. Discuss the interrelationship between the following:
  - . Environmental law
  - . Statutory construction
  - . The United States Code
  - . The Code of Federal Regulations
  - . State Laws and Regulations
- b. Describe the organization, mission, and enforcement authorities of the Environmental Protection Agency (EPA).
- c. Discuss the role of the Department's legal counsel in environmental compliance activities.
- d. Discuss the enforcement of environmental statutes under civil and criminal authorities.
- e. Describe the Executive Orders pertaining to environmental protection and compliance.

**36. Environmental compliance personnel shall demonstrate a working level knowledge of the requirements for managing environmental compliance data.**

Supporting Knowledge and/or Skills

- a. Describe the relationship of the following documents to the data management requirements of environmental compliance:
  - . DOE O 4.14.1, Quality Assurance
  - . NQA-1, Quality Assurance Program Requirements for Nuclear Facilities
  - . DOE G 1324.5B, Records Management
  - . DOE O 5400.5, Radiation Protection of the Public and the Environment
- b. Describe the quality assurance requirements for monitoring radiological air emissions specified in the National Emissions Standards for Hazardous Air Pollutants.
- c. Describe the Mean Relative Difference (MRD) statistical evaluations required by the Quality Assessment Program (QAP) for Department Laboratories. Include in your discussion the purpose of the three types of evaluations (duplicate, blind-sample, and split-sample) performed.

- d. Describe the program administered by the Environmental Protection Agency Environmental Monitoring System Laboratory-Las Vegas for quality control of environmental radiological measurements.
- e. Describe the program administered by the Department's Environmental Measurements Laboratory to assess the quality of environmental data reported to the Department.

### ***Waste Management***

#### **37. Environmental Compliance personnel shall demonstrate familiarity-level knowledge of hazardous waste as described in 40 CFR, Resource Conservation and Recovery Act.**

##### Supporting Knowledge and/or Skills

- a. Define the term "hazardous waste."
- b. Describe the difference between listed and characteristic hazardous waste.
- c. Using the decision tree in 40 CFR Part 260, relate RCRA solid waste to hazardous waste and identify the applicable RCRA regulations for each.
- d. Identify the kinds of hazardous wastes generated within the Department and their sources.
- e. Describe the combination of facilities used to manage hazardous wastes at a site.
- f. Discuss the current methods of disposing of hazardous wastes.
- g. Explain the relationship between the Resource Conservation and Recovery Act and the Federal Facilities Compliance Act (FFCA). Include in your discussion the development of Site Treatment Plans and development of Waste Treatment Technologies.
- h. Describe the types of facilities that need Resource Conservation and Recovery Act permits; list differences between a RCRA Part A and a RCRA Part B permit application; and give examples of RCRA Part B permit application requirements that apply to all facilities and those that apply to specific types of facilities.
- i. Describe how to determine if a material is a solid waste. Given a material that is a solid waste, describe how to determine if it is a hazardous or a mixed waste.
- j. Discuss the Land Disposal Restrictions, including the different types of treatment standards, the dilution prohibition, the storage prohibition, and different types of variances and exemptions.

- k. Discuss the regulatory requirements applicable to Federal facility solid waste landfills (including Resource Conservation and Recovery Act Subtitle D).
- l. Discuss the Personal Protective Equipment (PPE) requirements for work activities in hazardous areas.
- m. Discuss the potential liabilities of the Department of Energy and its contractors inherent in the enforcement of environmental regulations (i.e., compliance orders, enforcement actions, fines and penalties, and provisions for civil suits).
- n. Discuss the waste management requirements for polychlorinated biphenyls (PCBs) outlined by the Toxic Substances Control Act (TSCA).
- o. Discuss the Resource Conservation and Recovery Act underground storage tank regulations (Subtitle I).
- p. Describe the relationship of the Hazardous Materials Transportation Act (49 CFR Parts 170-179) to the Resource Conservation and Recovery Act transportation regulations (40 CFR Part 263).

**38. Environmental Compliance personnel shall demonstrate familiarity-level knowledge of the management of radioactive waste as described in:**

- DOE O 435.1, Radioactive Waste Management
- DOE M 435.1, Radioactive Waste Management

Supporting Knowledge and/or Skills

- a. Discuss the requirements identified in DOE O 435.1, Radioactive Waste Management, for the following types of waste:
  - . Low-level
  - . High-level
  - . Transuranic
- b. Discuss the Department's performance objectives and performance assessment for disposal of low-level radioactive waste as outlined in DOE M 435.1, Radioactive Waste Management.
- c. Discuss the low-level waste characterization requirements.
- d. Describe the Department's low-level radioactive waste acceptance criteria.
- e. Discuss the basic requirements for a low-level disposal site closure and for post closure operations.

- f. Define the term "mixed waste."
- g. Identify the applicable regulations and DOE Order for managing mixed low-level radioactive waste.

**39. Environmental compliance personnel shall demonstrate the ability to appraise the contractor's program(s) and/or permits to assess compliance with the requirements for Environmental Waste Management.**

Supporting Knowledge and/or Skills

- a. Given a proposed permit application, evaluate it for compliance with the Resource Conservation and Recovery Act requirements.
- b. Assess the contractor's plans and procedures for hazardous waste generation to ensure compliance with the Resource Conservation and Recovery Act land disposal and landfill restrictions.
- c. Assess the contractor's plans and procedures for a hazardous waste storage and disposal are to ensure compliance with the Resource Conservation and Recovery Act land disposal and landfill restrictions.
- d. Assess the contractor's plans and procedures for compliance with the Resource Conservation and Recovery Act non-hazardous solid waste disposal regulations.
- e. Assess to determine whether Resource Conservation and Recovery Act regulated site waste goes to on-site or off-site Resource Conservation and Recovery Act permitted landfills.
- f. Assess the contractor's plans and procedures for the reduction of waste through the use of waste minimization and pollution prevention.
- g. For a given activity in a hazardous area, identify the personal protective equipment (PPE) requirements.
- h. Given a type of personal protective equipment, demonstrate the proper use (donning and doffing) of the equipment.

## **APPENDIX A**

### **CONTINUING EDUCATION, TRAINING AND PROFICIENCY PROGRAM**

The following list represents suggested continuing education, training and other opportunities that are available for environmental compliance personnel after completion of the competency requirements in this technical Functional Area Qualification Standard. It is extremely important that personnel involved in environmental compliance maintain their proficiency through continuing education, training, reading, or other activities such as workshops, seminars, and conferences. The list of suggested activities was developed by the Subject Matter Experts involved in the development of the Functional Area Qualification Standard and is not all-inclusive.

Based on the knowledge and experience of the Subject Matter Experts, it is suggested that [*to be determined*] learning activities per [*to be determined*] are necessary to maintain proficiency in the environmental compliance functional area after completion of the competencies in the Standard and other requirements of the Technical Qualification Program.

### **LIST OF CONTINUING EDUCATION, TRAINING AND OTHER ACTIVITIES**

*To Be Determined.*