

CCP-TP-002

Revision 23

CCP

Reconciliation of DQOs and Reporting Characterization Data

EFFECTIVE DATE: 12/29/2010

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PRINTED NAME

APPROVED FOR USE

RECORD OF REVISION

Revision Number	Date Approved	Description of Revision
6	01/21/2002	Added one analyte and deleted two analytes from Attachment 4, Table 2. Revised step 4.5.1. Rerouted to SPM and SPQAO to format procedure to be in compliance with CCP-QP-010.
7	02/18/2002	Revised to update the way Attachment 2 is used.
8	03/07/2002	Changed 5 th Reconciliation parameter of Attachment 2B and revised WSPF Certification statement on page 25.
9	06/06/2002	Revised to update/refine process.
10	06/19/2002	Updated references; corrected references to attachments in CCP-TP-003; and deleted Attachment 3, Table 2.
11	10/24/2002	Added new Section 3.4; revised step 4.6.4; added new steps 4.5.2 through 4.5.4, 4.5.7, 4.7.8 through 4.7.10, and 4.7.12; based on comments from the SRS Recertification Audit.
12	04/30/2003	Added new #11 to Attachment 1A and 1B and Re-position of numbers to Attachment 2B. Addressed CBFO comments.
13	06/27/2003	Changes were made to incorporate Total Sampling. Revised CCP-TP-002-A1 and CCP-TP-002-A2. Separated electronically fillable forms and updated references in procedure.
14	03/29/2005	Incorporated attachments back into procedure. Incorporated changes per OSR Project. Minor editorial changes were also made. Updated instructions for completing Attachment 2, CCP Waste Stream Profile Form. Addressed CBFO comments.
15	08/16/2005	Minor revision due to editorial change, typo in Attachment 2.
16	06/06/2006	Revised to incorporate editorial clarification, and corrective actions in CAR-INL-0002-06, Revision 0 and CAR-CCP-0002-06, Revision 0.
17	10/10/2006	Revised in response to CAR No. 06-037.

RECORD OF REVISION (Continued)

Revision Number	Date Approved	Description of Revision
18	11/16/2006	Revised to implement the Waste Isolation Pilot Plant Hazardous Waste Facility Permit requirements resulting from the Section 311/Remote-Handled (RH) Permit Modification Request (PMR). Addressed Carlsbad Field Office (CBFO) Document Review Record (DRR) comments.
19	12/22/2006	Revised to clarify Waste Stream Profile Form contents.
20	08/18/2008	Revised Section 4.2.1 to incorporate Central Characterization Project (CCP) Standing Order CCP-SO-32. Updated several document/procedure titles. Minor changes to Section 5.0.
21	08/04/2009	Revised to answer Waste Isolation Pilot Plant (WIPP) Form 09-050, and add changes to Sections 3 and 4 and make any other editorial changes needed.
22	06/30/2010	Revised for Class 2 Modification Request WIPP Hazardous Waste Facility Permit EPA I.D. Number NM4890139088.
23	12/29/2010	Revised to implement the revision of the <i>Waste Isolation Pilot Plant Hazardous Waste Facility Permit</i> .

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1.0 PURPOSE

Upon completion of waste characterization activities, and prior to shipment of waste, the Central Characterization Project (CCP) is required to reconcile the data in accordance with the requirements of CCP-PO-001, *CCP Transuranic Waste Characterization Quality Assurance Project Plan (QAPjP)*. Data reconciliation is required in order for the CCP Site Project Manager (SPM) to complete and submit a Waste Stream Profile Form (WSPF).

1.1 Scope

This procedure provides data reconciliation with the data quality objectives (DQOs) following data validation and verification at the CCP Project Office. This reconciliation is performed at the waste stream or waste stream lot level. This procedure provides the instructions for the completion of the WSPF, the Characterization Information Summary (CIS), and the Waste Stream Characterization Package for submittal to the U.S. Department of Energy (DOE) Carlsbad Field Office (CBFO) for approval prior to shipment. This procedure identifies applicable content TRUPACT-II Content codes (TRUCON) codes and shipping categories for containers in a waste stream.

2.0 REQUIREMENTS

2.1 References

Baseline Documents

- DOE/WIPP 01-3194, *CH-TRU Waste Content Codes (CH-TRUCON)*
- DOE/WIPP 90-045, *RH-TRU Waste Content Codes (RH-TRUCON)*
- CCP-PO-003, *CCP Transuranic Authorized Methods for Payload Control (CCP CH-TRAMPAC)*
- CCP-PO-505, *CCP Remote-Handled Transuranic Waste Authorized Methods for Payload Control (CCP RH-TRAMPAC)*
- CCP-TP-005, *CCP Acceptable Knowledge Documentation*

Referenced Documents

- 40 CFR 261, *Identification and Listing of Hazardous Waste, Subpart C, Characteristics of Hazardous Waste.*

- 40 CFR 261, *Identification and Listing of Hazardous Waste, Subpart D, Lists of Hazardous Wastes*
- NM 4890139088-TSDF, *Waste Isolation Pilot Plant Hazardous Waste Facility Permit, Attachments C-C6, (Waste Analysis Plan)*
- DOE/TRU-2006-3344, *Transuranic Waste Baseline Inventory Report – 2004*
- CCP-PO-001, *CCP Transuranic Waste Characterization Quality Assurance Project Plan*
- CCP-PO-002, *CCP Transuranic Waste Certification Plan*
- CCP-QP-002, *CCP Training and Qualification Plan*
- CCP-QP-005, *CCP TRU Nonconforming Item Reporting and Control*
- CCP-QP-008, *CCP Records Management*
- CCP-TP-001, *CCP Project Level Data Validation and Verification*
- CCP-TP-003, *CCP Data Analysis for S3000, S4000, and S5000 Characterization*
- CCP-TP-005, *CCP Acceptable Knowledge Documentation*
- CCP-TP-030, *CCP CH TRU Waste Certification and WWIS/WDS Data Entry*
- CCP-TP-162, *CCP Random Selection of Containers for Solids and Headspace Gas Sampling and Analysis*
- CCP-TP-530, *CCP RH TRU Waste Certification and WWIS/WDS Data Entry*

2.2 Training Requirements

- 2.2.1 Personnel performing this procedure will be trained and qualified in accordance with CCP-QP-002, *CCP Training and Qualification Plan*, prior to performing this procedure.

3.0 RESPONSIBILITIES

3.1 Site Project Manager (SPM)

Ensures that all data generated and used in decision making meet the DQOs provided in, *Waste Isolation Pilot Plant Hazardous Waste Facility Permit, Attachments C-C6, Waste Analysis Plan*.

- [A] Assesses whether data of sufficient type, quality, and quantity have been collected.
- [B] Determines if the variability of the data set is small enough to provide the required confidence in the results.
- [C] Determines if, based on the desired error rates and confidence levels, a sufficient number of valid data points have been determined (as established by the associated completeness rate for each sampling and analytical process).
- [D] Documents that random sampling of containers, as applicable, was performed for the purpose of waste stream characterization.
- [E] Documents any deviation from the containers specified for sampling in the random selection.

NOTE

The WSPF Package consists of the WSPF, the CIS (for the lot addressing the applicable headspace or solids analysis data of the subject waste stream), and the Summation of Aspects of the Acceptable Knowledge (AK) Summary.

- 3.1.2 Completes and submits the WSPF and revisions to the WSPF.
- 3.1.3 Completes and submits the CIS and updates or revisions to the CIS.
- 3.1.4 Completes the Summation of Aspects of the AK Summary and revisions to the Summation of Aspects of the AK Summary.
- 3.1.5 Prepares the WSPF Package upon request from the DOE CBFO.

3.2 Acceptable Knowledge Expert (AKE)

NOTE

As the waste stream is characterized, the AKE is responsible for corroborating the AK information with the characterization data collected. For the final data reconciliation (conducted in accordance with this procedure), the AKE provides assistance to the SPM.

- 3.2.1 Compiles the AK information for the waste stream being characterized.
 - 3.2.2 Creates the AK summary which is used to create the Summation of Aspects of the AK summary.
 - 3.2.3 Assigns a unique waste stream number for each waste stream based on information in the Annual Transuranic Waste Inventory Report (ATWIR) and/or information from the Host site.
 - 3.2.4 Reviews and concurs with the WSPF Package and subsequent revisions (change notices).
- 3.3 Host Site Subcontract Technical Representative (STR)
- 3.3.1 If required by the site-specific interface document, reviews and concurs with the WSPF Package.

4.0 PROCEDURE

NOTE

The attachments in this document are examples of the requirements. The examples identify the minimum information required in the final approved report.

NOTE

Steps DO **NOT** need to be followed in sequence.

SPM

4.1 Assigning the WSPF Number

NOTE

The unique number will be limited to a maximum of 20 alpha-numeric characters. The first two characters will be the two letter site designator, and the remaining characters should coincide, to the maximum extent possible, with the Waste Stream ID number listed in the AK Summary Report.

- 4.1.1 Assign the Waste Stream Number to the WSPF per the AK Summary Report.
-

NOTE

The Waste Stream Number is recorded on all applicable attachments.

NOTE

Data entry in the WIPP Waste Information System (WWIS)/Waste Data System (WDS) is done in accordance with CCP-TP-030, *CCP CH TRU Waste Certification and WWIS/WDS Data Entry*, or CCP-TP-530, *CCP RH TRU Waste Certification and WWIS/WDS Data Entry*.

4.2 Compilation and Evaluation of DQO Parameters

- 4.2.1 For the lot to be processed, select an appropriate number of containers that have completed CCP Project Office verification and validation from the waste stream population.

- [A] Ensure that all of the containers selected are from the same waste stream by comparing the container numbers/waste stream identification numbers with the AK Tracking Spreadsheet for the subject site.

- [B] Ensure (for solids/soils [S3000/S4000] waste streams that require solids sampling and analysis) that the required random selection has been completed, in accordance with CCP-TP-162, *CCP Random Selection of Containers for Solids and Headspace Gas Sampling and Analysis* **AND** the required minimum number of samples has been taken and analyzed, **OR** an AK Sufficiency has been approved.
- [B.1] **IF** the required random selection, sampling, and analysis, **OR** an AK Sufficiency Determination has **NOT** been performed, **THEN** direct the appropriate site facility to perform the required actions.
- [B.2] **IF** the required random selection and sampling has been performed, but there has been a deviation from the containers specified for sampling in the random selection, **THEN** confirm that the appropriate site project manager has prepared and submitted the required memorandum identifying the replaced and replacement container(s) and the reason for replacement to CCP Records as directed in CCP-TP-162.
- [C] Ensure (for debris [S5000] waste streams that require headspace gas sampling and analysis), that the required random selection has been completed, in accordance with CCP-TP-162, **AND** the required minimum number of samples has been taken and analyzed, **OR** an AK Sufficiency has been approved.
- [C.1] **IF** the required random selection, sampling, and analysis, **OR** AK Sufficiency Determination has **NOT** been performed, **THEN** direct the appropriate site facility to perform the required actions.

- [C.2] **IF** the required random selection and sampling has been performed, but there has been a deviation from the containers specified for sampling in the random selection,
THEN confirm that the appropriate SPM has prepared and submitted the required memorandum identifying the replaced and replacement container(s), and the reason for replacement to CCP Records as directed in CCP-TP-162.
- [D] Ensure all containers from any waste stream that requires Gas Generation Testing (GGT) meet one of the following requirements:
- [D.1] The container is on an approved GGT Batch Data Report (BDR) and that the BDR is the most recent.
- [D.2] The container is included in an approved Long Term Objective (LTO) population.
- [E] Ensure all containers from any waste stream that require Flammable Gas (FG) for Transportation Sampling meet one of the following requirements:
- The container is on an approved Headspace Gas (HSG) BDR and that the BDR is the most recent.
 - The container is on an approved FG for Transportation BDR and that the BDR is the most recent.
- [F] Ensure all data to be used for certification was generated using certified equipment. Reference <ftp://q.wipp.ws/certification>, file titled CCP SYSTEM PROCESS AND CERTIFICATION STATUS.
- [G] Ensure that each of the BDRs chosen to certify the containers is the most recent BDR available for that characterization process (i.e., Nondestructive Examination [NDE], Real-Time Radiography [RTR] or Visual Examination [VE], Nondestructive Assay [NDA], HSG, FG, Dose-to-Curie [DTC]), Radiological Characterization.

- 4.2.2 Obtain copies of the following documents from CCP Records, as applicable:
- Documentation of Radiological Properties (e.g., NDA BDR), VE, NDE, Solids Analysis, and HSG, **AND/OR** an AK Sufficiency Determination
 - HSG Summary Report for previous waste lots
 - Solids Summary Report for previous waste lots, if applicable
 - CCP Headspace Gas UCL₉₀ Evaluation Form (CCP-TP-003, *CCP Data Analysis for S3000, S4000, and S5000 Characterization - Attachment 3*)
 - CCP Solids Analysis VOC UCL₉₀ Evaluation Form (CCP-TP-003 - Attachment 4)
 - CCP Solids Analysis Semi-VOC UCL₉₀ Evaluation Form (CCP-TP-003 - Attachment 5)
 - CCP Solids Analysis Metals UCL₉₀ Evaluation Form (CCP-TP-003 - Attachment 6)
 - Previous records of data completion and reconciliation with DQOs (see Attachment 1, CCP Reconciliation with Data Quality Objectives, for an example)
 - Previously completed CIS submitted to records on interoffice memo
- 4.2.3 Determine if sufficient data have been collected to determine if program-required waste parameters have been met, by completing the CCP Reconciliation with Data Quality Objective (see Attachment 1, CCP Reconciliation with Data Quality Objective, for an example), using the attached instructions.
- 4.2.4 **IF** sufficient data has been collected, **THEN** enter the Waste Stream Number and Lot Number on the CCP Reconciliation with Data Quality Objective.
- 4.2.5 **IF** data **DOES NOT** meet the criteria on the CCP Reconciliation with Data Quality Objective, **THEN** sufficient data has **NOT** been collected to fully characterize the waste stream, therefore, determine the additional waste characterization that needs to be performed **AND** direct the appropriate site facility to collect the additional data.

NOTE

The CCP Reconciliation with Data Quality Objective contains multiple questions for each entry. If there are discrepancies between questions or if entries are Not Applicable (N/A), comments will be added to the form explaining how criteria are met.

- 4.2.6 Complete the CCP Reconciliation with Data Quality Objective, using the attached questions.
 - 4.2.7 Print name, sign, and date the CCP Reconciliation with Data Quality Objective.
 - 4.2.8 Place the CCP Reconciliation with Data Quality Objective in the holding file.
- 4.3 Preparing Waste Stream Profile Form (WSPF)
-

NOTE

The current approved revision of the waste stream AK Summary should be used in preparing or revising the WSPF.

- 4.3.1 **IF** a WSPF exists for the waste characterization data being reconciled,
THEN GO TO Section 4.7.
- 4.3.2 Ensure all characterization data obtained from CCP Records for the waste stream in question have gone through project level validation (i.e., signed SPM checklists).
- 4.3.3 Prepare a CCP WSPF (see Attachment 2, CCP Waste Stream Profile Form, for an example) using the instructions included in Attachment 2.
- 4.3.4 Review, print name, sign, and date the WSPF.
- 4.3.5 Place the CCP Waste Stream Profile Form in the holding file.

4.4 Completing the Characterization Information Summary

NOTE

Include the list of site-specific/CCP procedures, revisions, and dates used in characterizing the containers in the lot.

- 4.4.1 Using the cover page found in the CCP Characterization Information Summary Cover Page (see Attachment 3, CCP Characterization Information Summary Cover Page, for an example), record the Waste Stream Number and Lot Number.
- 4.4.2 Complete the cross-reference listing the container numbers to each BDR (see Attachment 4, CCP Correlation of Container Identification Numbers to Batch Data Report Numbers, for an example).
- [A] For items **NOT** analyzed enter N/A.
- [B] Print name, sign, and date the CCP Correlation of Container Identification Numbers to Batch Data Report Numbers.
- [C] Place the CCP Correlation of Container Identification Numbers to Batch Data Report Numbers in the holding file.
- 4.4.3 Copy the completed UCL₉₀ form for the applicable analyses:
- CCP Headspace Gas UCL₉₀ Evaluation Form, CCP-TP-003 - Attachment 3
 - CCP Solids Analysis VOC UCL₉₀ Evaluation Form, CCP-TP-003 - Attachment 4
 - CCP Solids Analysis Semi-VOC UCL₉₀ Evaluation Form, CCP-TP-003 - Attachment 5
 - CCP Solids Analysis Metals UCL₉₀ Evaluation Form, CCP-TP-003 - Attachment 6
- 4.4.4 Complete the summary data for the applicable analyses for the lot of the waste stream:
- CCP Headspace Gas Summary Data (see Attachment 5, CCP Headspace Gas Summary Data, for an example)
 - CCP Solids VOCs Summary Data (see Attachment 6, CCP Solids VOCs Summary Data, for an example)

- CCP Solids SVOCs Summary Data, (see Attachment 7, CCP Solids SVOCs Summary Data, for an example)
- 4.4.5 Sign and date CCP Headspace Gas Summary Data, **OR** CCP Solids VOCs Summary Data **AND** CCP Solids SVOCs Summary Data.
- 4.4.6 Place CCP Headspace Gas Summary Data, **OR** CCP Solids VOCs Summary Data **AND** CCP Solids SVOCs Summary Data in the holding file.
- 4.4.7 **IF** the AK Summary for the waste stream identified the Hazardous Waste Number U134 (hydrofluoric acid), **THEN** address in CCP RTR/VE Summary of Prohibited Items (see Attachment 8, CCP RTR/VE Summary of Prohibited Items for an example) that any liquid identified is a prohibited item per the applicable operating procedure and is **NOT** acceptable by the Treatment, Storage, and Disposal Facility (TSDF).
- 4.4.8 Complete the CCP RTR/VE Summary of Prohibited Items to document that prohibited items are **NOT** present in the waste stream or waste stream lot.

NOTE

If CBFO approves, VE may be performed on S3000 and S4000 when the material is not removed from the characterized container.

- 4.4.9 Complete the justification for the selection of radiography and/or VE as the appropriate method for characterizing the waste.
- 4.4.10 Print name, sign, and date CCP RTR/VE Summary of Prohibited Items.
- 4.4.11 Place CCP RTR/VE Summary of Prohibited Items in the holding file.
- 4.5 Summation of Aspects of the AK Summary
- 4.5.1 Obtain an approved copy of the AK Summary for the subject waste stream in order to create a summary level version of the AK Summary, entitled the Summation of Aspects of the AK Summary.
- 4.5.2 Create the Summation of Aspects of AK Summary and include the following information: waste stream name and number, point of generation, waste stream volume (current and projected),

generation dates, TRUCON codes, Summary Category Group, Waste Matrix Code(s) and Waste Matrix Code Group, other ATWIR information, waste stream description, areas of operation, generating processes, Resource Conservation and Recovery Act (RCRA) determinations, radionuclide information, method for determining Waste Material Parameter (WMP) weights per unit of waste (CH only), all references used to generate the Summation of Aspects of AK Summary, and any other information required by CCP-PO-001.

4.5.3 Attach a list of any approved AK Sufficiency Determinations for the waste stream.

4.6 Submitting the WSPF Package to DOE CBFO

4.6.1 Compile the WSPF Package consisting of the following:

- WSPF
- CIS
- Summation of Aspects of the AK Summary

4.6.2 Forward a copy to the AKE for review and concurrence.

4.6.3 **IF** required by the appropriate site-specific Interface Document, **THEN** forward a copy to the STR for review and concurrence.

4.6.4 **IF** comments are received from the AKE **AND/OR** STR, **THEN** resolve the comments, **AND** forward a copy of the resolution to the reviewer for concurrence.

4.6.5 **AFTER** concurrence(s) is/are received, **THEN** continue with this section.

4.6.6 Transmit the WSPF Package via e-mail to the DOE CBFO electronic mail (email) site at site.documents@wipp.ws.

4.6.7 **IF** comments are received from DOE CBFO, **THEN** repeat steps 4.6.2 through 4.6.6 until comments have been resolved.

4.6.8 Submit completed WSPF Package to CCP Records in accordance with CCP-QP-008, *CCP Records Management*, with an interoffice memo.

NOTE

Additional documentation concerning the following items may be requested by DOE CBFO:

- The waste stream description (from the AK Summary Report)
 - Point of Generation and Generating Processes (from AK Summary Report)
 - Hazardous Waste Determinations
 - Ignitability
 - Corrosivity
 - Reactivity
 - Toxicity
 - Listed Waste Containers
 - Conclusion
 - Polychlorinated Biphenyls (PCBs)
 - Physical Form
 - Prohibited Items
 - Radionuclide Information
-

4.7 Subsequent Data Reconciliation

4.7.1 Obtain a copy of the WSPF Package from CCP Records.

4.7.2 Perform applicable steps of Sections 4.2 and 4.4.

4.7.3 **IF** the waste **DOES NOT** meet the WSPF Package description, **THEN** revise the WSPF Package, **OR** assign the waste to a new waste stream.

[A] **IF** subsequent data collection reveals discrepancies that identify different hazardous waste numbers, **THEN** the Waste Stream Profile will be revised.

[B] **IF** subsequent data collection reveals discrepancies that indicate the waste belongs to a different waste stream, **THEN** initiate an NCR in accordance with CCP-QP-005.

NOTE

A revision required to the WSPF Package that **DOES NOT** result in addition of EPA HWNs or a change to the Waste Matrix Code is called a change notice (CN). CNs are appended to the WSPF Package and the WIPP Operating Record.

- [C] **IF** the WSPF Package requires a change based on a CN, **THEN** make the appropriate changes in accordance with guidance provided in the CCP Waste Stream Profile Form, **AND** submit the CN to CCP Records and DOE CBFO in accordance with the applicable steps in Section 4.6.

- [D] **IF** the waste **DOES NOT** match the subject WSPF Package (i.e., discrepancies are noted that identify different HWNs or indicate that the waste belongs to a different waste stream), **THEN** perform the following:
 - [D.1] Notify the AKE that the subject waste must be redefined to a separate waste stream in accordance with the applicable steps of CCP-TP-005, *CCP Acceptable Knowledge Documentation*, Section 4.8.

 - [D.2] Generate a new WSPF Package in accordance with Sections 4.2 through 4.6.

4.7.4 Provide documentation of the waste stream lot data reconciliation to CCP Records that includes the CCP CIS, and CCP Reconciliation with Data Quality Objective.

4.8 Completing the Waste Stream Characterization Package

- 4.8.1 When requested by DOE CBFO, prepare the Waste Stream Characterization Package for the requested waste stream.
- 4.8.2 Obtain a copy of the subject WSPF Package from CCP Records.
- 4.8.3 Obtain copies of the subject CISs for each of the waste stream lots associated with the subject waste stream from CCP Records.
- 4.8.4 Obtain a complete copy of the AK Summary for the subject waste stream from CCP Records.
- 4.8.5 Obtain copies of the BDRs as requested by DOE CBFO from CCP Records.

- 4.8.6 Obtain copies of other data requested by DOE CBFO from CCP Records.
- 4.8.7 Assemble the information, **AND** transmit to DOE CBFO.

5.0 RECORDS

- 5.1 Records generated during the performance of this procedure are maintained as QA Records in accordance with CCP-QP-008. The records are the following:

QA/Lifetime

- [A] Characterization Information Summary
 - [A.1] CCP Reconciliation with Data Quality Objective
 - [A.2] CCP Characterization Information Summary Cover Page with attached interoffice memorandum
 - [A.3] CCP Correlation of Container Identification Number to Batch Data Report Numbers
 - [A.4] CCP Headspace Gas Summary Data, when applicable
 - [A.5] CCP Solids VOCs Summary Data, when applicable
 - [A.6] CCP Solids SVOCs Summary Data, when applicable
 - [A.7] CCP RTR/VE Summary of Prohibited Items
- [B] Waste Stream Profile Form Package
 - [B.1] CCP Waste Stream Profile Form – includes Interoffice Memorandum of Submittal from the SPM
 - [B.2] CIS for the lot addressing the applicable headspace or solids analysis data
 - [B.3] Summation of Aspects of the AK Summary, if applicable

Attachment 1 – CCP Reconciliation with Data Quality Objective (Example)

Sampling Completeness

RTR:

Number of valid samples: _____ Number of total samples analyzed: _____
Percent Complete: _____ (QAO is 100%)

NDA:

Number of valid samples: _____ Number of total samples analyzed: _____
Percent Complete: _____ (QAO is 100%)

HSG:

Number of valid samples: _____ Number of total samples collected: _____
Percent Complete: _____ (QAO is $\geq 90\%$)
Number of valid samples: _____ Number of total samples analyzed: _____
Percent Complete: _____ (QAO is $\geq 90\%$)

Total VOC:

Number of valid samples: _____ Number of total samples collected: _____
Percent Complete: _____ (QAO is $\geq 90\%$)
Number of valid samples: _____ Number of total samples analyzed: _____
Percent Complete: _____ (QAO is $\geq 90\%$)

Total SVOC:

Number of valid samples: _____ Number of total samples collected: _____
Percent Complete: _____ (QAO is $\geq 90\%$)
Number of valid samples: _____ Number of total samples analyzed: _____
Percent Complete: _____ (QAO is $\geq 90\%$)

Total Metals:

Number of valid samples: _____ Number of total samples collected: _____
Percent Complete: _____ (QAO is $\geq 90\%$)
Number of valid samples: _____ Number of total samples analyzed: _____
Percent Complete: _____ (QAO is $\geq 90\%$)

Attachment 1 – CCP Reconciliation with Data Quality Objective (Example) (Continued)

Waste Stream#: _____ Lot #: _____

	Y/N/NA	Reconciliation Parameter
1.		Waste Matrix Code.
2.		Waste Material Parameter Weights.
3.		The waste matrix code identified is consistent with the type of sampling and analysis used to characterize the waste.
4.		The TRU activity reported in the BDRs for each container demonstrates with a 95 percent probability that the container of waste contains TRU radioactive waste.
5.		<u>AK Sufficiency.</u> Is there an approved AK sufficiency Determination for this waste stream?
6.		Mean concentrations, UCL ₉₀ values for the mean concentration, standard deviations, and the number of samples collected for each VOC in the HSG of each container were calculated and compared with the program required quantitation limits, as reported in CCP-TP-003, Attachment 3, and additional U.S Environmental Protection Agency (EPA) Hazardous Waste Numbers were assigned as required. Samples were randomly collected (when appropriate).
7a.		Mean concentrations, UCL ₉₀ values for the mean concentration, standard deviations, and the number of samples collected for solids VOCs were calculated and compared with the program required quantitation limits and regulatory thresholds, as reported in the Characterization Information Summary, CCP-TP-003, Attachment 4, and additional EPA HWNs were assigned as required. Samples were randomly collected.
7b.		Mean concentrations, (UCL ₉₀) values for the mean concentration, standard deviations, and the number of samples collected for solids SVOCs were calculated and compared with the program required quantitation limits and regulatory thresholds, as reported in the Characterization Information Summary, CCP-TP-003, Attachment 5, and additional EPA HWNs were assigned as required. Samples were randomly collected.
7c.		Mean concentrations, (UCL ₉₀) values for the mean concentration, standard deviations, and the number of samples collected for total metals were calculated and compared with the program required quantitation limits and regulatory thresholds, as reported in the Characterization Information Summary, CCP-TP-003, Attachment 6, and additional EPA HWNs were assigned as required. Samples were randomly collected.

Attachment 1 – CCP Reconciliation with Data Quality Objective (Example) (Continued)

Waste Stream #: _____

Lot #: _____

	Y/N/NA	Reconciliation Parameter			
8.		The data demonstrates whether the waste stream exhibits a toxicity characteristic under Title 40 <i>Code of Federal Regulations</i> (CFR), Part 261, <i>Identification and Listing of Hazardous Waste</i> , Subpart C, <i>Characteristics of Hazardous Waste</i> .			
9.		Does the waste stream contain listed waste found in 20.4.1.200 NMAC incorporating 40 CFR Part 261, Subpart D, <i>Lists of Hazardous Wastes</i> .			
10.		Waste stream can be classified as hazardous or nonhazardous at the 90 percent confidence level.			
11.		Appropriate packaging configuration and Drum Age Criteria (DAC) is applied and documented in the HSG sampling documentation, and the drum age met prior to sampling.			
12.		Tentatively identified compounds (TICs) were appropriately identified and reported in accordance with the requirements of Section C3-1 of the QAPjP.			
13.		The program required quantitation limits (PRQLs) for HSG VOCs were met for all analyses as evidenced by the analytical BDRs.			
14.		The overall completeness, comparability, and representativeness QAOs were met for each of the analytical and testing procedures as specified in CCP-PO-001 Sections C3-2 through C3-9 prior to submittal of a WSPF for a waste steam or waste stream lot.			
			Completeness	Comparability	Representativeness
		Radiography			
		VE			
		Headspace Gas Sampling And Analysis			
		Solids Sampling			
		Solids VOCs			
		Solids SVOCs			
		Total Metals			
Comments					

SPM Printed Name

Signature

Date

Attachment 1 – CCP Reconciliation with Data Quality Objective (Example) (Continued)

Instructions for completing form:

Prior to completing Blocks 1 through 13, the SPM or Designee shall complete the Sampling Completeness portion of Attachment 1.

For each waste container and process, verify that:

- The waste container, by serial number, is included in the BDR shown for each characterization methodology listed in Attachment 4, CCP Correlation of Container Identification Numbers to Batch Data Report Number.
- The BDR has gone through project level validation and verification and has received SPM approval.
- The waste container was not removed from the BDR via NCR.

This information is recorded on Attachment 1 under the Sampling Completeness.

This process confirms that the samples are valid and that there is analysis data in the BDRs to support the determination, by the SPM, of program-required waste parameters for the total number of samples collected.

1. Waste Matrix Code. Is the waste matrix code assigned to the waste stream in the AK Summary Report supported by the radiography and/or VE testing BDRs?
2. Waste Material Parameter Weights. Are the waste material parameters listed in the AK Summary reported in kilograms for each of the waste material parameters identified in the waste stream?
3. Waste Matrix Code. Are the characterization methods used consistent with the identified waste matrix code (CCP-PO-001, Section C3)?
4. TRU Radioactive Waste. Does the TRU activity reported in the BDR for each container demonstrate compliance with CCP-PO-002, *CCP Transuranic Waste Certification Plan*?
5. AK Sufficiency Determinations requested for the waste stream? If the answer is Yes, record request in comments field and document the use of the AK Sufficiency Determination as objective evidence for answering Yes to other DQOs.

Attachment 1 – CCP Reconciliation with Data Quality Objective (Example) (Continued)

6. Mean concentrations, UCL₉₀ for the mean concentrations, standard deviations, and the number of samples collected for each Volatile Organic Compound (VOC) in the (HSG) Sampling of waste containers in the waste stream are complete (if applicable). Was the waste stream or lot sampled for the correct number of HSG samples (either 100 percent or the number of samples determined to be representative for the waste stream if reduced sampling is allowable)? If less than 100 percent HSG sampling was performed, is the random selection of the containers documented and were the correct containers sampled.
7. Mean concentrations, UCL₉₀ for the mean concentrations, standard deviations, and the number of samples collected for Solid VOCs, Semi Volatile Organic Compounds (SVOCs), and metals in the waste stream. Was the correct number of samples collected for the waste stream? Is the random selection of the containers that were sampled documented and were the correct containers sampled? Questions 7a, 7b, and 7c refer to S3000 and S4000 waste streams.
8. Toxicity Characteristic. Does the waste exhibit a toxicity characteristic under 40 CFR Part 261, Subpart C?
9. Listed Waste. Does the waste stream contain listed waste found in 20.4.1.200 NMAC incorporating 40 CFR Part 261, Subpart D?
10. Hazardous Waste Determination. Can the waste stream be classified as hazardous or nonhazardous at the 90-percent confidence level?
11. Packaging Configuration and Drum Age Criteria (DAC). Was an appropriate packaging configuration and DAC applied and documented in the HSG sampling documentation, and was the DAC met prior to sampling?
12. Tentatively Identified Compounds (TICs). Were all TICs appropriately identified and reported in accordance with the requirements of the QAPjP Section C3-1? Has the number of any individual TIC identified in the entire waste stream been detected in more than 25 percent of the samples? If so, has the TIC been added to the target analyte list? This information is found in the Headspace Gas Data Summary Report (CCP-TP-003, Attachment 10; CCP-TP-003, Attachment 11; CCP-TP-003, Attachment 3; CCP-TP-003, Attachment 4; CCP-TP-003, Attachment 5; and CCP-TP-003, Attachment 6).
13. Program Required Quantitation Limits (PRQLs). Did each of the analytical methods used for characterization of this waste stream or waste stream lot demonstrate the ability to meet the PRQL limits for that technique (BDRs)?

Attachment 1 – CCP Reconciliation with Data Quality Objective (Example) (Continued)

14. Completeness, Comparability, and Representativeness. Have the overall completeness, comparability, and representativeness quality assurance objective (QAOs) for each of the testing, sampling, and analytical processes been met for the waste stream or waste stream lot by answering each of the following questions:

- Completeness: HSG Sampling, HSG Analysis, Solid Sampling, Solids VOCs, Solids SVOCs, Total Metals:
 - Has the amount of valid data obtained from the overall measurement system compared to the amount of data collected and submitted for analysis met the 90 percent threshold?
 - RTR: Is there an audio/videotape (or equivalent media) of the radiography examination and a validated radiography data form for 100 percent of the containers subject to radiography?
 - VE: A validated VE data form will be obtained for 100 percent of the waste containers subject to VE.
- Comparability: HSG Sampling, NDE, VE, HSG Analysis, Solid Sampling, Solid VOCs, Solid SVOCs:
 - Was the correct approved version of the procedure used by qualified operators to acquire, verify, and validate the data?
- Representativeness: Was the correct approved version of the procedure used to control:
 - HSG Sampling: DAC selection, leak checking, cleaning, low volume (<10 percent), pressure controls, and acquisition of QC samples?
 - HSG Analysis: Collecting sufficient numbers of samples using clean sampling equipment that does not introduce sample bias?
 - Solid Sampling: Cleaning, coring depth (50 percent of waste), and minimal waste disturbance?
 - Solid VOCs, Solid SVOCs, Total Metals: The acquisition of unbiased samples?

Attachment 1 – CCP Reconciliation with Data Quality Objective (Example) (Continued)

- NDE: Viewing test image, resolving discrepancies between two operators
- VE: reconciling any discrepancies between the operator and the Independent Technical Reviewer

Attachment 2 – CCP Waste Stream Profile Form (Example)

(1) Waste Stream Profile Number:			
(2) Generator site name:		(4) Technical contact:	
(3) Generator site EPA ID:		(6) Technical contact phone number:	
(5) Date of audit report approval by New Mexico Environment Department (NMED):			
(7) Title, version number, and date of documents used for WAP Certification:			
(8) Did your facility generate this waste? YES <input type="checkbox"/> NO <input type="checkbox"/>			
(9) If no, provide the name and EPA ID of the original generator:			
Waste Stream Information¹			
(10) WIPP ID:		(11) Summary Category Group:	
(12) Waste Matrix Code Group:		(13) Waste Stream Name:	
(14) Description from the TWBIR:			
(15) Defense TRU Waste: YES <input type="checkbox"/> NO <input type="checkbox"/>			
(16) Check One: CH <input type="checkbox"/> RH <input type="checkbox"/>			
(17) Number of SWBs	(18) Number of Drums	(19) Number of Canisters	
(20) Batch Data Report numbers supporting this waste stream characterization:			
(21) List applicable EPA Hazardous Waste Numbers: ²			
(22) Applicable TRUCON Content Numbers:			
(23) Acceptable Knowledge Information¹			
(For the following, enter the supporting documentation used [i.e., references and dates])			
Required Program Information			
(23A) Map of site:			
(23B) Facility mission description:			
(23C) Description of operations that generate waste:			
(23D) Waste identification/categorization schemes:			
(23E) Types and quantities of waste generated:			
(23F) Correlation of waste streams generated from the same building and process, as applicable:			
(24) Waste certification procedures:			
(25) Required Waste Stream Information			
(25A) Area(s) and building(s) from which the waste stream was generated:			
(25B) Waste stream volume and time period of generation:			
(25C) Waste generating process description for each building:			
(25D) Waste Process flow diagrams:			
(25E) Material inputs or other information identifying chemical/radionuclide content and physical waste form:			
(25F) Waste Material Parameter Weight Estimates per unit of waste			
(26) Which Defense Activity generated the waste: (check one)			
Weapons activities including defense inertial confinement fusion		Naval Reactors development	
Verification and control technology		Defense research and development	
Defense nuclear waste and material by products management		Defense nuclear material production	
Defense nuclear waste and materials security and safeguards and security investigations			

Attachment 2 – CCP Waste Stream Profile Form (Example) (Continued)

CCP WASTE STREAM PROFILE PACKAGE

A WSPF Package should be completed as early as possible (once sufficient data has been obtained [e.g., at least one lot]) and submitted to DOE CBFO for approval.

The SPM, in completing the WSPF, should seek the assistance and participation of the AKE in the preparation of the form and attachments.

The WSPF package submitted to DOE CBFO for approval contains three parts. The first part is the WSPF itself. The second part is the CIS Report for the waste stream or waste stream lot used to support the WSPF. The last part is the *Summation of Aspects of the AK Summary Report*, to support the WSPF. The completion of the first and third parts of the package is addressed in these instructions. Completion of the CIS is addressed in CCP-TP-002, *CCP Reconciliation of DQOs and Reporting Characterization Data*, and associated forms.

Instructions for completing the Waste Steam Profile Form:

Obtain an approved copy of the current WSPF Package from CCP Records; for new WSPFs, it will be blank.

Line numbers indicated below refer to the number in the parenthesis on the CCP Waste Stream Profile Form.

The brackets [] indicate the primary source of the information requested if not otherwise referred to within the instruction.

Line 1:

Assign a site-specific waste stream profile number to each form generated. The number should normally coincide, to the extent possible, with the waste stream ID number listed in the AK Summary Report. The SPM is responsible for selecting the number after referring to the AK Summary Report. The number should start with the applicable two-digit site designator. The number should be limited to 20 alpha-numeric characters maximum. Indicate waste stream lots with a period and sequentially numbered digits added to the waste stream profile number.

Attachment 2 – CCP Waste Stream Profile Form (Example) (Continued)

Line 2:

Enter the name of the site where the waste is currently stored. [AK Summary Report]

Line 3:

Enter the EPA ID Number of the site listed in Line 2. The ID number, if not included in the AK Summary Report, can be obtained from the EPA Regional office in which the site is located. The AKE should assist in the acquisition of this information.

Line 4:

Enter the name of the technical contact for this site. This is the individual to be contacted if there are questions concerning the data reported on the form, usually the SPM.

Line 5:

Enter the date of the audit report approval by NMED. Use the most recent audit report approval date and include all previous approval dates as appropriate. If the site has been audited but an audit report has not yet been approved by DOE CBFO, contact the CCP Project Manager. If DOE CBFO has approved the audit report and is awaiting approval by NMED, submit the WSPF package to DOE CBFO for distribution to the WIPP Review Team.

Line 6:

Provide the telephone number of the person identified in Line 4.

Attachment 2 – CCP Waste Stream Profile Form (Example) (Continued)

Line 7:

List the site-specific waste program documents (such as CCP-PO-001, the CCP-PO-003, Interface, etc.) listing the current revision only, upon which waste certification authority was based. Also include the current revision of the AK Summary Report for this waste stream. Include the title, revision, revision number and effective date of the revision for each document.

An example of the format for this line is:

CCP-PO-001, Rev 6, CCP Transuranic Waste Characterization Quality Assurance Project Plan, June 11, 2003

Use a continuation sheet if necessary.

Line 8:

Check the appropriate box. [AK Summary Report]

Line 9:

If the site where the waste is currently stored is not the site where the waste was generated, then provide the name and EPA identification number of the site where the waste was generated. [The AK Summary Report should provide the information as to where the waste was generated. The ID number, if not included in the AK Summary Report, can be obtained from the EPA Regional Office in which the site is located. The AKE should assist in the acquisition of this information.]

If the waste was generated at the site where it is currently stored, place an N/A in this box.

Attachment 2 – CCP Waste Stream Profile Form (Example) (Continued)

Line 10:

Enter the WIPP identification number from the current revision of the TRU Waste Baseline Inventory Report (ATWIR) that best describes the waste stream being certified. CCP may split or combine ATWIR waste streams for the purposes of defining waste sampling populations. If CCP has split or combined ATWIR waste streams, all contributing ATWIR waste streams to the WSPF should be indicated on the Summation of Aspects of AK Summary Report.

If there is no corresponding WIPP ID number listed in the ATWIR or if the ATWIR information is in error or no longer applies, enter None Available. If there is no corresponding WIPP ID number listed in the ATWIR, you may also contact the AKE for assistance.

(A copy of the ATWIR may be found in the WIPP Technical Library in the Skeen Whitlock Building.)

Line 11:

Enter the Summary Category Group identified in the AK Summary Report as representing this waste stream.

Line 12:

Enter the Waste Matrix Code (WMC) Group identified in the AK Summary Report as representing this waste stream. Use only WMC Groups identified in the WAP. If more than one WMC Group will be assigned to a waste stream, notify the CCP Project Manager prior to submitting the WSPF to DOE CBFO for review and approval.

Line 13:

Enter the name of the waste stream from the AK Summary Report.

Line 14:

Enter the waste stream description from the ATWIR (preferred) or AK Summary Report.

Attachment 2 – CCP Waste Stream Profile Form (Example) (Continued)

Line 15:

Check the appropriate box. [AK Summary Report]

If the answer to this question is NO, stop work and notify the CCP Program Manager immediately. This waste can not be disposed of at the WIPP Site.

Line 16:

Check the appropriate box.

CH=contact-handled TRU waste
RH=remote-handled TRU waste

[AK Summary Report for the waste stream identified above.]

Line 17:

Enter the number of standard waste boxes in this waste stream (current and projected). [AK Summary Report] If there are no standard waste boxes in the waste stream, N/A should be entered.

Line 18:

Enter the total number of drums in the waste stream (current and projected). Enter the number of TDOPs, 85-gallon drums and 100-gallon drums if applicable (current and projected). [AK Summary Report]

If there are no drums (e.g., only SWBs or Canisters) in the waste stream, N/A should be entered.

Line 19:

Enter the number of canisters in this waste stream (current and projected). [AK Summary Report]

If there are no canisters in the waste stream, N/A should be entered.

Attachment 2 – CCP Waste Stream Profile Form (Example) (Continued)

Line 20:

List the TRU Waste Batch Data Report (BDR) numbers used to support the completion of this WSPF. This list shall include every container and the associated BDRs from each process in the waste stream OR every container in the waste stream lot and the associated BDRs from each process used in that characterization (for example NDA, NDE, HSG, VE, etc). Reference may be made to the CIS (Attachment 3 and contents) (The CIS for the waste stream, or waste stream lot associated with the WSPF, is submitted as part of the WSPF package to DOE CBFO for approval).

Line 21:

List each EPA Hazardous Waste Number that is present in the waste stream. Each Hazardous Waste Number must be listed in the WIPP Hazardous Waste Facility Permit, Attachment C, Table C-9, Hazardous Waste Permit Application, Part A. Each EPA Hazardous Waste Number must be justified in the Waste stream specific AK Summary Report. The AKE should assist in this determination.

Line 22:

Enter all of the TRUCON Content Numbers, from the current revision of the content codes document applicable to this waste stream. Consult with the CCP WCO for assistance.

Line 23: A-F

Reference all of the appropriate sections, figures, or pages in the current revision of the AK Summary Document (including the document title, number, revision number and effective date) for this waste stream where the listed information can be found in the AK document.

Line 24:

List all of the waste stream certification procedures applicable to this waste stream. Include procedure numbers, revision numbers, titles, and effective date. This list should contain all revisions of a document that were used during the characterization of the waste. References may be made to the CIS, Attachment 3.

Attachment 2 – CCP Waste Stream Profile Form (Example) (Continued)

Line 25 A-F:

Reference all of the appropriate sections, figures, or pages in the current revision of the AK Summary Document (including the document title, number, revision number and effective date) for this waste stream where information listed can be found in the AK document.

Line 26:

Check the ONE box that best describes the defense activity that generated the waste. If more than one defense activity is described in the AK Summary Report, document additional activities on the WSPF as a footnote to Line 26. [AK Summary Report]

Line 27 A-L:

Sites must provide the appropriate references to the site-specific documents that contain any additional documentation that is used to support the use of AK for TRU waste characterization. Items in this section must be given the same level of consideration as the items in the Required Program Information and Required Waste Stream Information sections. This information may either be inserted into the block or referenced as listed on a continuation sheet. The AKE should provide appropriate lists of documents for use in completing Line 27. Only those documents referenced in the AK Summary Report should be included in these lists.

Attachment 2 – CCP Waste Stream Profile Form (Example) (Continued)

Using information from the AK Record or from a document that is traceable to the AK record, provide a reference for the following parameters:

- (A) Process design document (e.g., Title II Design).
- (B) Standard operating procedures, including procedure date and reference number, that may include a list of raw materials or reagents, a description of the process or experiment generating the waste, and a description of the process or experiment generating the waste, and a description of waste generated and how the wastes are managed at the point of generation.
- (C) Preliminary and final safety analysis reports and technical safety requirements.
- (D) Waste packaging records.
- (E) Test plans or research project reports that describe reagents and other raw materials used in experiments.
- (F) Site databases (e.g., chemical inventory database for Superfund Amendments and Reauthorization Act Title III requirements).
- (G) Information from site personnel (e.g., documented interviews).
- (H) Standard industry documents (e.g., vendor information).
- (I) Analytical data relevant to the waste stream, including results from fingerprint analyses, spot checks, routine verification sampling, or other processes that collect information pertinent to the waste stream. This may also include new information acquired apart from the confirmatory process, which supplements required information (e.g., visual examination not performed in compliance with the WAP, radiography screening for prohibited items).
- (J) MSDSs, product labels, or other product package information.
- (K) Sampling and analysis data from comparable or surrogate waste streams (e.g., equivalent nonradioactive materials).
- (L) Laboratory notebooks that detail the research processes and raw materials used in an experiment.

Line 28 through 29

If any of these blocks do not apply, indicate NA in the block and provide a brief explanation of the NA choice. [The most current revision of each document is found on the CCP ftp site.] Reference may be made to the CIS, (Attachment 3).

Attachment 2 – CCP Waste Stream Profile Form (Example) (Continued)

Line 28

List all of the most current revisions of the approved applicable Radiography procedure(s) by the title, number, revision number, and effective date in the appropriate block or list it on a continuation sheet (Include operating procedures, calibration procedures etc.).

Line 29

List all of the most current revisions of the approved visual examination procedure(s) by the title, number, revision number, and effective date in the appropriate block or list them on a continuation sheet (Include operating procedures, calibration procedures etc.).

Line 30

Document that the AKE review was completed here. Maintain a review record with the approved WSPF. Document the STR review if it is required by the applicable interface document otherwise check N/A. Provide comments as appropriate.

Line 31 to 33

When waste stream is fully characterized, the SPM SHALL attest to authenticity and validity of the data and certify that the waste stream meets all requirements for compliance to the WIPP HWFP, Attachment C, WAP, and the WAC. This is done by signing the WSPF.

Line 31

SPM signature.

Line 32

SPM's printed name.

Line 33

Date signed.

Instructions for completing the Summation of Aspects of the AK Summary Report:

This summation should be as succinct as possible. The reviewers of this document generally do not refer to the AK Summary report and are therefore looking to this summation to document compliance with the WIPP HWFP.

Attachment 2 – CCP Waste Stream Profile Form (Example) (Continued)

Example:

SUMMATION OF ASPECTS OF AK SUMMARY REPORT: WASTE STREAM NTXXXXXXX

Overview

The overview is an executive summary of the summation. It should contain general information about where the waste was generated, where it is stored, reference to the Waste Stream Profile Form number and the Acceptable Knowledge Summary Report from which the information is compiled, etc. In addition, the overview should contain summary level information that the waste stream is derived from defense related activities.

Waste Stream Identification Summary

This section should contain, as a table, the information identified below, if applicable.

- Site Where TRU Waste Was Generated
- Site Where TRU Waste Is Currently Stored
- Waste Stream Name
- Waste Stream Number
- Waste Stream Profile Form Number
- Dates of Waste Generation
- Facility Where TRU Waste Was Generated
- Repackaging Dates
- Waste Stream Volume (current and projected by container)
- Summary Category Group
- Waste Matrix Code Group
- EPA Hazardous Waste Numbers
- Waste Matrix Code
- TRUPACT-II Content code (TRUCON)
- Waste Stream TWBIR Identification [Include applicable discussion when consolidating TWBIR numbers into 1 waste stream]

Attachment 2 – CCP Waste Stream Profile Form (Example) (Continued)

Waste Stream Description and Physical Form

This section should contain information regarding what the waste consists of generally. For instance: the source of the waste - nonline laboratory trash that is heterogeneous debris and includes plastics, rubber paper glass, etc.

Point of Generation

Location

Specifically where the waste was generated:

Facility, description of the site, state, area designation, building number, production line, etc.

Specifically where it is currently stored (if different)

Facility, description of the site, state area designation, building number, production line, etc.

Area and/or Buildings of Generation

Short summary regarding the buildings or areas or productions lines, etc. that generated the waste.

Generating Processes

Description of Waste Generating Processes

This section should be a more detailed description of where and how the waste is generated. It can be building by building, process line by process line, or any other grouping that makes sense. These descriptions should be complete enough for understanding yet still striving for brevity.

Table of Chemicals Expected

A Table of Chemicals, including CAS numbers, expected as delineated in the AK Summary is a succinct method for presenting this information.

Attachment 2 – CCP Waste Stream Profile Form (Example) (Continued)

RCRA Determinations

Hazardous Waste Determinations

Does the waste qualify for any of the exclusions outlined in 40 CFR 260 or 261? If so, list what exclusion apply and write a short justification. The AKE should assist in the hazardous waste determination. Include discussions in appropriate section below for instances where EPA Hazardous Waste Numbers are added as a result of confirmation activities (e.g., solids sampling data).

Ignitability

Ignitable (D001) wastes are prohibited from disposal at WIPP. Any potential D001 wastes in the waste stream must be evaluated and a determination of whether or not to apply the D001 number must be made. Sometimes the determination has already been made and documented in the AK. Other times, the SPM must make the determination based on any evaluation of the characterization data or procedures. Special care must be taken to address items such as metal powders which are not normally thought of as ignitable.

Some chemicals, to which the D001 Hazardous Waste Number is applied, may be identified in the AK. The D001 number is applied due to ignitability. The SPM must be able to address the ignitability of these wastes and determine that the characteristic of ignitability does not apply.

If the SPM can not positively state at the conclusion of this section that “The waste number for ignitability (D001) does not apply to this waste stream,” contact the CCP Project Manager.

Corrosivity

Corrosive (D002) wastes are prohibited from disposal at WIPP. Any potential D002 wastes in the waste stream must be evaluated and a determination of whether or not to apply the D002 number must be made.

Sometimes the determination has already been made and documented in the AK Summary (for instances acids were neutralized by procedure). Other times, the SPM must make the determination based on an evaluation of the characterization data or procedures.

If the SPM can not positively state at the conclusion of this section that “The waste number for Corrosivity (D002) does not apply to this waste stream,” contact the CCP Project Manager.

Attachment 2 – CCP Waste Stream Profile Form (Example) (Continued)

Reactivity

Reactive (D003) wastes are prohibited from disposal at WIPP. Any potential D003 wastes in the waste stream must be evaluated and a determination of where or not to apply the D003 number must be made. Sometimes the determination has already been made and documented in the AK. Other times, the SPM must make the determination based on an evaluation of the characterization data or procedures.

If the SPM can not positively state at the conclusion of this section that “The waste number for Reactivity (D003) does not apply to this waste stream,” contact the CCP Project Manager.

Toxicity

Determine if the waste in this waste stream meets the definition of toxicity as defined in 40 CFR 261.24. For each chemical listed in CFR 261.24, determine if the Hazardous Waste Number should be applied to the waste stream.

If the Hazardous Waste Number should be applied, list at least one use of the chemical. For example:

Barium (D005)

Barium is present in excess of the toxicity characteristic regulatory level in leaded gloves and glovebox windows, which are known to be in TRU waste containers.

Based on this information, the D005 Hazardous Waste Number has been assigned to the waste.

If it is not possible to identify a specific source of the chemical, but the determination is made to apply the number, state that the number is being applied conservatively based on the information available.

Listed Waste

F-Listed Waste

Determine if the waste in this waste stream meets the requirements for listing as an F-Listed (Hazardous Waste from Non-Specific Sources) as defined in 40 CFR 261.31. For each chemical listed in CFR 261.31, determine if the Hazardous Waste Number should be applied to the waste stream.

If the Hazardous Waste Number should be applied, list at least one use of the chemical.

If it is not possible to identify a specific reason to apply the number for a chemical, but never the less the determination is made to apply the number, state that the number is being applied conservatively based on the information available.

| Attachment 2 – CCP Waste Stream Profile Form (Example) (Continued)

K-Listed Waste

K-Listed wastes (Hazardous Waste from Specific Sources) are unlikely in waste to be shipped to WIPP. If K wastes are included, document as below for P and U-Listed wastes.

P and U-Listed Wastes

P and U-Listed wastes are lists of chemicals that if present in the waste as pure un-used commercial chemical products would require the application of the Hazardous Waste Number.

Determine if the waste in this waste stream meets the requirements for listing as a P or U-Listed as defined in 40 CFR 261.33. For each chemical listed in CFR 261.33, determine if the Hazardous Waste Number should be applied to the waste stream.

If the Hazardous Waste Number should be applied, list at least one use of the chemicals.

If it is not possible to identify a specific reason to apply the number for a chemical, but never the less the determination is made to apply the number, state that the number is being applied conservatively based on the information available.

Hydrofluoric acid (U134) and Beryllium (P015) are of special interest and must be addressed in every WSPF.

Conclusion

List the Hazardous Waste Numbers that apply to the waste stream.

Polychlorinated Biphenyls

Evaluate the presence of PCBs in the waste.

Attachment 2 – CCP Waste Stream Profile Form (Example) (Continued)

Prohibited Items

State why the following prohibited items will not be in the waste shipped to WIPP.

- Liquid waste
- Non-radioactive pyrophoric materials
- Waste incompatible with backfill, seal and panel closure materials, container and packaging material, or other wastes
- Explosives or compressed gases
- Waste with PCBs not authorized under an EPA PCB waste disposal authorization
- Waste exhibiting the characteristics of ignitability, corrosivity, or reactivity
- Non-mixed hazardous waste

Headspace Gas/Volatile Organic Compound Information

Briefly summarize the headspace gas information from the CIS and Headspace Gas Summary Report (CCP-TP-003).

Example:

The lot from waste stream XXXXX consists of 60 55-gallon drums. Seven tentatively identified compounds (TICs) were identified in this lot. These compounds are listed in the Headspace Gas Summary Report. No TIC was found in greater than 25 percent of the containers in this lot.

The UCL₉₀ calculated values, using either the transformed or untransformed value, of all of the Target Analytes are below the program required quantification limits (PRQLs).

Specific information about the maximum, mean, standard deviation and UCL₉₀ are contained in the Headspace Gas Summary Report.

Method for Determining Waste Material Parameter Weights per Unit of Waste

Describe the method used for determining waste material parameter weight estimates per unit of waste.

List of Any AK Sufficiency Determinations Requested for the Waste Stream

List applicable AK sufficiency determinations.

Transportation

Briefly discuss WAC transportation requirements as they pertain to beryllium and other items as dictated by the waste stream.

Attachment 2 – CCP Waste Stream Profile Form (Example) (Continued)

Radionuclide Information

Present the two most prevalent isotopes expected from the waste stream (CH only).

A list of radionuclides expected in the waste stream may be presented in the table (radionuclides and all isotopes) as an appendix. Include the presence or absence of the ten WIPP-tracked radionuclides.

Example:

Radionuclide	Isotope	Isotope	Isotope	Isotope	Isotope
Nickel	63				
Palladium	Unknown isotope				
Plutonium	236	238	239	240	241

Include a brief discussion on payload management per the WIPP WAC, Appendix E.

Source Documents

A list of source documents referenced in the AK Summary Report may be presented as a table in an appendix.

Example:

U030	Selected LLNL Hazardous Waste Disposal Requisitions
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Revision to the Waste Stream Profile Form Package

Revision to the Waste Stream Profile Form Package occurs in two different ways.

- A change notice (CN) may be created to document revisions to the AK, as represented in the AK Summary.
- A new WSPF is created because the characterization of the waste stream has changed (e.g., addition of EPA HWNs).

Under the CN process, the latest approved revision of the AK Summary is compared to the CBFO approved Waste Stream Profile Form Package. Revisions to the AK Summary, that are described in the Waste Stream Profile Form Package (typically the WSPF and the Summation of Aspects of the AK Summary), as well as newly identified information that is applicable to the Waste Stream Profile Form Package, are documented and justified in a CN.

Attachment 2 – CCP Waste Stream Profile Form (Example) (Continued)

Examples of information documented in a CN include, but are not limited to:

- Application of additional TRUCON Content codes
- Revision to waste stream volume, number of drums and SWBs
- Addition of material parameter weight estimates per unit of waste

Change notices are identified with the following header and are numbered as follows:

Physical waste stream name and revision number (unique waste stream number)
(Change Notice #, starting with the number one for each waste stream and increasing
by one for each additional CN), “update to the Waste Stream Profile Form”.

Change notices are appended to the records version of the WSPF Package and the
WIPP Operating Record. The correct change notice number is identified by reviewing
the appended WSPF Package in either location.

Change notices are reviewed and approved in the same manner as a WSPF Package.

Attachment 3 – CCP Characterization Information Summary Cover Page (Example)

Waste Stream #: _____ Lot #: _____

AK Expert Review: _____ Date: _____

SPM Review: _____ Date: _____

SPM signature certifies that through Acceptable Knowledge testing and/or analysis that the waste identified in this summary is not corrosive, ignitable, reactive, or incompatible with the TSDF.

A summary of the Acceptable Knowledge regarding this waste stream containing specific information about the corrosivity, reactivity, and ignitability of the waste stream is included as an attachment to the Waste Stream Profile Form. By reference, that information is included in this lot.

List of procedures used:

Attachment 5 – CCP Headspace Gas Summary Data (Example)

Waste Stream Number _____ Lot Number (s) _____

Tentatively Identified Compound	Maximum Observed Estimated Concentrations (ppmv)	# Samples Containing TIC	% Detected
Data Supports EPA Hazardous Waste Numbers Assigned by AK? Yes <input type="checkbox"/> No <input type="checkbox"/>			
If no, describe the basis for assigning the EPA Hazardous Waste Numbers:			

SPM Signature _____ Date _____

Attachment 6 – CCP Solid VOCs Summary Data (Example)

Waste Stream Number: _____ Lot Number (s) _____

Tentatively Identified Compound	Maximum Observed Estimated Concentrations (ppmv)	# Samples Containing TIC	% Detected

Data Supports EPA Hazardous Waste Numbers Assigned by AK? Yes No

If no, describe the basis for assigning the EPA Hazardous Waste Numbers:

SPM Signature _____

Date _____

Attachment 7 – CCP Solids SVOCs Summary Data (Example)

Waste Stream Number: _____ Lot Number (s) _____

Tentatively Identified Compound	Maximum Observed Estimated Concentrations (ppmv)	# Samples Containing TIC	% Detected

Data Supports EPA Hazardous Waste Numbers Assigned by AK? Yes No

If no, describe the basis for assigning the EPA Hazardous Waste Numbers:

SPM Signature _____

Date _____

Attachment 8 – CCP RTR/VE Summary of Prohibited Items (Example)

CCP RTR/VE Summary of Prohibited Items

Waste Stream Number: _____

Lot(s)#: _____

Container Number	RTR Prohibited Items ^{a,b}	Visual Examination Prohibited Items ^{a,b}
a. See Batch Data Reports b. If AK has assigned U134 to this waste stream, then any liquids in these containers are prohibited items (not acceptable by the TSDf)		
Justification for the selection of RTR and/or VE:		

Site Project Manager Signature

Printed Name

Date