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LANL Waste Management

1.0 PURPOSE

This document describes Los Alamos National Laboratory (LANL or the Laboratory) requirements for waste generated and managed by Waste Generators and Treatment Storage Facilities (TSFs) to ensure compliance with legal mandates and Laboratory requirements as necessary to protect human health, safety, and the environment. This document has been revised as part of a process in which the Laboratory systematically plans, documents, executes, and evaluates its management of regulated waste streams.

This document addresses LANL's waste management requirements for Waste Generators and TSFs as necessary to safely manage, store, and treat wastes. The Waste Generator must know and document what is in the waste, and TSFs must meet waste analysis requirements under the [LANL Hazardous Waste Facility Permit](#). This document also addresses LANL's Waste Certification and Self-Assessment Programs, to ensure there is a systematic, documented approach for compliance with requirements in this document.

All Waste Generators, including subcontractors, who generate a regulated waste, must work with Waste Management (WM) to meet the requirements in this and other required documents to ensure that the following are met:

- the waste is properly characterized, managed, stored, and transported, and
- the waste certification program is implemented at the waste generating site before the waste is shipped off-site from LANL.

The Environmental Protection Agency (EPA) and the New Mexico Environment Department (NMED) have established requirements, which are addressed in this document, for Waste Generators and TSFs to ensure regulated waste is characterized, managed, stored, treated, and transported compliantly. To ensure compliance with legal mandates, the requirements in this and other requirements documents (i.e., [P930-1](#), *LANL Waste Acceptance Criteria*, Associate Director for Environment, Safety, and Health [ADESH], and Functional Series Documents [FSDs]) are established to be consistent with Department of Energy (DOE) Orders, federal and state laws and regulations, the [LANL Hazardous Waste Facility Permit](#), and reporting requirements.

2.0 AUTHORITY AND APPLICABILITY

2.1 Authority

This document is issued under the authority of the Laboratory Director to direct the management and operation of the Laboratory, as delegated to ADESH as provided in the [Prime Contract](#). This document derives from the Laboratory [Governing Policies](#), particularly the section on Environment, and implements requirements in the [Prime Contract](#), particularly Department of Energy Acquisition Regulation (DEAR) 970.5223-1, *Integration of Environment, Safety, and Health into Work Planning and Execution* (Dec. 2000); Part III, Section J, Appendix B 4.2 and Part III, Section J, Appendix G; [DOE Order \(O\) 435.1](#), *Radioactive Waste Management*; [DOE Manual \(M\) 435.1-1](#); *Radioactive Waste Management Manual*; the [Resource Conservation and Recovery Act \(RCRA\)](#); the [Toxic Substances Control Act \(TSCA\)](#); [New Mexico Special Waste Act](#); [74-9-1 NMSA 1978](#), *Solid Waste Act*, and the [74-4-1 NMSA 1978](#), *Hazardous Waste Act*.

- Issuing Authority (IA): Associate Director for Environment, Safety, and Health (ADESH)
- Responsible Manager (RM): Waste Management (WM) Division Leader
- Responsible Office (RO): Waste Management-Division Office (WM-DO)

2.2 Applicability

This document applies to all workers, including subcontractors, who generate, manage, treat, or store regulated waste at the Laboratory as a Waste Generator or at a TSF. Regulated waste, as used in this document, refers to all types of waste including office waste, solid waste, universal waste, hazardous waste, mixed radioactive waste, and radioactive-only waste. Waste Generators include workers who generate regulated waste and store the waste in staging areas, accumulation areas, or less-than 90 day storage areas. TSFs include workers who manage, treat, or store regulated waste under the [LANL Hazardous Waste Facility Permit](#). All other persons working at the Laboratory must follow the requirements as set forth in their contractual agreements or subcontracts.

3.0 PROCEDURE DESCRIPTION

3.1 Overview

There are two main aspects to this document. First, it establishes specific responsibilities for Waste Generators and TSFs to manage and store regulated wastes to ensure the protection of human health, safety, and the environment (Sections 3.2 through 3.7). Second, it describes LANL's Waste Certification Program, which requires a documented approach to ensure that waste management (treatment, storage and disposal) of waste streams complies with applicable requirements (Section 3.8) prior to off-site shipment.



Fig. 1. LANL Waste Management Components

Waste Generators and TSF workers will find more detailed information on waste compliance in the ADESH FSDs. These FSDs may consist of non-mandatory information, such as aids and guidance (ADESH-TOOLS) or mandatory requirements, regarding waste type and compliance factors. These FSDs are issued by ADESH in accordance with [PD311](#), *Requirements System and Hierarchy* and [ADESH-AP-007](#), *Document Control*.

If a Facility Operations Director (FOD), the Facility Responsible Line Manager (RLM), a Facility Point of Contact and/or a Waste Generator chooses to specify additional local-level procedures for waste management activities, those local procedures and changes thereto must be reviewed and approved through WM-DO before they are issued and implemented. Such procedures, including ADESH Administrative Procedures (ADESH-APs) and ADESH Technical Procedures (ADESH-TPs), may be subject to review in accordance with Safety Basis Procedure (SBP) [SBP-112-3-R1.2](#), *Unreviewed Safety Question (USQ) Process*, and [P315](#), *Conduct of Operations Manual*. WM-DO confirms that Waste Generators are compliant with potential waste streams through oversight requirements for their waste streams and that waste requirements are met in the planning stage for all waste and potential waste streams.

Before waste generating projects (remediation, Demolition and Decontamination, Footprint Reduction, etc.) begin, WM-DO must review (1) all characterization methodologies that were part of the planning stage and the preparation for waste disposition and (2) all requests for use of a DOE or LANL subcontractor that was not procured through [WM-DO](#) via e-mail.

Before generating regulated waste or commencing waste characterization activities, a Waste Generator must consult with their [Waste Management Coordinator \(WMC\)](#). TSFs must comply with their local-level procedures and the [LANL Hazardous Waste Facility Permit](#).

Waste Generators and TSFs must also meet the requirements of the LANL Pollution Prevention Program, which implements pollution minimization goals through Pollution Prevention Opportunity Assessments and other tools. The LANL Pollution Prevention Program requires Waste Generators and TSFs to identify potential alternatives to the generation of waste including use of less toxic materials, alternative processes, waste minimization techniques, and following the requirements [DOE O/M 435.1](#), *Radioactive Waste Management/Manual* and [DOE O 436.1](#), *Departmental Sustainability*. In addition, TSFs must meet waste minimization requirements of the [LANL Hazardous Waste Facility Permit](#).

The Waste Certification Official (WCO) must be notified by the originating organization when a Nonconformance Report (NCR) or a Performance Feedback and Improvement Tracking System (PFITS) issue is entered into the system regarding regulated waste. WCO concurrence for corrective actions must be obtained by e-mail prior to closure.

3.2 Identifying Waste

Waste Generators must correctly identify their waste through waste characterization as specified below. If a Waste Generator needs assistance with and/or cannot identify the waste type, the worker must contact their WMC. In addition, if a LANL worker or subcontractor discovers a waste stream with no identifiable Waste Generator, the worker must contact their WMC. See [ADESH-TOOL-213](#), *No Owner Waste*.

“Office waste” refers to wastes generated in an office environment and can include solid waste (e.g., office paper, food waste, trash), recyclables (e.g., paper, cardboard, plastics), universal waste (e.g., batteries and fluorescent light bulbs) and hazardous waste (e.g., aerosol cans). [ADESH-TOOL-114](#), *Office Waste Tool*, [ADESH-TOOL-111](#), *Waste Characterization*, and [ADESH-TOOL-314](#), *Radioactive Characterization*, help Waste Generators quickly identify their regulated waste types and describe additional tools with requirements for their regulated waste types.

Project Management (PM) projects, Environmental Remediation (ER) or decontaminated and decommissioned must notify WM-DO via e-mail of upcoming waste generation projects and provide all pertinent planning documentation and characterization documentation for evaluation. Use of the Permits and Requirements Identification (PRID) system is required (see [PD400](#), *Environmental Protection*).

3.2.1 Waste Characterization

Waste Generators and TSFs are required to ensure that waste characterization is accurate, complete and up-to-date. Waste Generators must make a waste determination and characterize regulated waste by appropriate analytical testing or use of acceptable knowledge e.g., Material Safety Data Sheets (MSDSs), product labels, and historical data. TSFs must meet waste analysis plan requirements under the [LANL Hazardous Waste Facility Permit](#) prior to acceptance of the generator’s waste for treatment or storage. If a Waste Generator does not supply complete and adequate waste characterization information, the TSF or off-site Treatment Storage and Disposal Facility (TSDF) may not accept the waste. Waste Generators and TSFs must ensure that waste characterization documentation is maintained, protected, controlled, and available for internal and/or any third party reviews.

Note: TSF workers become “Waste Generators” when activities at the TSF (e.g., repackaging, sorting, and segregation) lead to the generation of regulated waste or trigger re-characterization of the waste stream as described within this section.

Waste Generators must consult with their WMCs to start the waste characterization process, when working with a new process that may create a new regulated waste stream, or when waste processing has been modified. [ADESH-TOOL-111](#), *Waste Characterization* and [ADESH-TOOL-314](#), *Radioactive Characterization*, help Waste Generators document and characterize regulated wastes, and describe additional tools with requirements for their regulated waste types. The Waste Generator must sign a Waste Stream Profile (WSP) Certification Statement in the [Waste Compliance and Tracking System \(WCATS\)](#), assuring that waste characterization is correct and meets applicable waste acceptance criteria. This certification attests to the accountability and legal defensibility of the waste characterization for internal or external third party reviews.

As part of the requirement to characterize regulated waste, the Waste Generator must

- submit a waste stream profile in WCATS for each waste stream;
- upload all waste characterization documentation into WCATS and ensure that all valid documentation is referenced in WCATS with a unique identifier;
- sign the WSP Certification Statement assuring accurate and complete characterization of the waste; and
- annually re-evaluate waste characterization for each WSP to verify accuracy of the waste characterization. For compliance purposes, this annual period is defined as less than one year since the original waste characterization or the last recharacterization.

After waste has been identified and entered into WCATS, the waste characterization will be reviewed by the WM-DO prior to a new waste stream identification number being activated. WM-DO screens documentation for LANL facilities that characterize waste streams by acceptable knowledge, process knowledge (or knowledge of process), historical knowledge, etc.

Note: If waste with no disposal path must be generated, the Waste Generator must contact [WM-DO](#) via e-mail for prior authorization.

TSFs must meet waste characterization requirements of the [LANL Hazardous Waste Facility Permit](#), including specifically the Waste Analysis Plan (WAP).

3.2.1.a Waste Generator Recharacterization

Waste Generators must recharacterize and update waste characterization based on the following conditions if

- after an annual re-evaluation, there is any change to waste characterization information, including changes to the waste-generating process or operations;
- there is a change to the waste-generating processes or operations;
- analytical results indicate a change in the waste stream;
- new characterization information becomes available;
- a waste container is opened and secondary material is added to the container;
- waste is repackaged and secondary material is added during this process;
- there is a change in the ownership of a WSP; or
- the Waste Generator is notified that waste received at an off-site facility does not match a pre-approved waste analysis certification or accompanying shipping documentation.

Note: TSF workers may become Waste Generators when waste processing includes one of the activities described above.

The Waste Generators must contact the WM-DO in the event it is required to update waste characterization information described above. WM-DO will work through appropriate subject matter experts to assess the identified changes in the waste characterization and recommend actions.

3.2.1.b Recharacterization at Treatment and Storage Facilities (TSFs)

Under the [LANL Hazardous Waste Facility Permit](#), TSFs must update their waste characterization when the following occurs:

- a Waste Generator determines one or more of the above conditions in Section 3.2.1.a has occurred;
- TSF workers have reason to believe that the process or operation generating the waste has changed;
- waste is repackaged and secondary material is added during this process;
- waste received at an off-site facility does not match a pre-approved waste analysis certification or accompanying shipping documentation; or
- an inspection reveals that the waste does not match the identity of the waste specified by the Waste Generator or a manifest on a shipping paper.

3.2.2 Waste Containing Potential Radioactive Contamination

Potentially radioactive wastes (e.g., the waste or waste item was generated in a radiologically contaminated area) are summarized in [ADESH-TOOL-306](#), *Potentially Radioactive or Mixed Investigation-Derived Waste*. The Waste Generator is required to meet the actions specified in the tool.

If radioactive contamination is reasonably suspected to be present at a site (e.g., in wastes from potential release sites or poorly documented decontaminated and decommissioned sites), the waste must be characterized. See [ADESH-TOOL-314](#), *Radioactive Characterization*. The Authorized Release Limits Process is defined in [P411](#), *Authorized Release Limits Proposal Process* and is applicable only to materials that

- have residual radioactivity below the dose limits specified in [DOE O 458.1](#), *Radiation Protection of the Public and the Environment*, and
- do not contain [74-4-1 NMSA 1978](#), *Hazardous Waste Act* and [Resource Conservation and Recovery Act \(RCRA\)](#) constituents.

Note: For release of potentially activated metals previously stored in Radiation Control areas, see [RP-SOP-077.004](#), *LANSCE Metals Clearance Process* and [RP-SVS-RIC-TBD-03](#), *Technical Basis Documentation Regarding Health Physics Measurements for the Unrestricted Release of Metals from LANSCE*.

3.2.3 Waste Verification

To ensure compliance with DOE Directives, federal and state laws and regulations, [P930-1](#), *LANL Waste Acceptance Criteria*, and reporting requirements, WM-DO completes a verification checklist in accordance with [WM-PROG-QP-236](#), *Waste Certification Program Waste Verification*, and must verify accurate and thorough waste characterization. This includes the random or selected waste stream and can include the following (if applicable):

- a review of radiological assay;
- a visual examination of the waste;
- a sampling and chemical analysis of the waste;
- a verification that the waste has been properly characterized in accordance with applicable procedures, acceptable knowledge documentation, non-destructive assay records, chemical analysis documentation, and, if applicable, documentation of past visual examinations of the waste;
- a review of past verification results to determine the nature of any pre-existing problems; and
- a review of facility waste processes and procedures to verify operations meet waste certification requirements.

Note: The [LANL Hazardous Waste Facility Permit](#) requires an annual verification of the waste characterization of one percent of the total number of hazardous waste streams characterized solely by acceptable knowledge and managed at TA-54 in the previous calendar year.

3.3 Packaging Waste

Low-Level Waste (LLW) and Mixed Low-Level Waste (MLLW) must meet waste package certification requirements before the waste is disposed. Waste Generators of LLW and MLLW must make a request via e-mail to [WM-DO](#) to arrange for waste package certification. If there are specific waste issues regarding LLW and MLLW, the Waste Generator must contact the [WCO](#). To ensure compliance with federal and state laws, regulations and reporting requirements, the WCO will rely on established waste disposition requirements that are consistent with Waste Acceptance Criteria (WAC) requirements from the Nevada National Security Site (NNSS).

To prepare for waste disposition, the Waste Generator must refer to the [600 Series](#) FSDs, (*Transport of Waste*). All waste information regarding waste disposition must be documented in WCATS and a disposal request must be submitted through the WCATS system by the WMC. This will prompt WM-DO to initiate a waste shipment. WM-DO must be consulted on all specific waste issues as WM-DO is responsible for compliance with safe packaging and transportation requirements to off-site receiving facilities.

3.4 Storing Waste

Waste Generators and TSFs will store their waste in accordance with the requirements listed below.

3.4.1 Waste Areas

Waste Generators are responsible for ensuring that on-site waste accumulation and temporary storage (e.g., less-than 90-day storage areas) are conducted in [Registered Waste Areas](#). For more detailed instruction see the following:

- [ADESH-TOOL-206](#), *Hazardous Waste*;

- [300 Series Tools](#), (*Radioactive Waste*);
- [400 Series Tools](#), (*Universal Waste*);
- [500 Series Tools](#), (*NM Special Waste*);
- [ADESH-TOOL-712](#), *Polychlorinated Biphenyl (PCB) Waste*; and
- [ADESH-TOOL-716](#), *Used Oil for Recycle*.

TSFs can meet the requirements in the [LANL Hazardous Waste Facility Permit](#) by operating to the [800 Series Tools](#), (*Treatment, Storage, and Disposal Facilities*).

The WMC must also certify waste protection and storage by evaluating the waste and using [ADESH-TOOL-300](#), *General Radioactive Waste Management*, and [P930-1](#), *LANL Waste Acceptance Criteria*.

3.4.2 Site Treatment Plan (STP) for Mixed Transuranic (MTRU) and Mixed Low-Level Waste (MLLW) at TSFs

In accordance with the Site Treatment Plan (STP), LANL must report to NMED all MTRU waste and MLLW that will be stored at the Laboratory after 1-year of its accumulation start date. For STP waste containers, the start date refers to the date of receipt for storage at the LANL TSF. The STP summarizes the status of the current inventory, describes the progress being made to dispose of the waste, identifies treatment and disposal options for addressing the STP inventory, and provides overall schedules for management and disposition of mixed waste to demonstrate compliance with Land Disposal Requirement storage prohibitions under the RCRA and demonstrates compliance with the Federal Facility Compliance Order issued by NMED under the New Mexico Hazardous Waste Act.

To meet these compliance requirements, Waste Generators must notify the [STP Manager](#) via e-mail at least three months prior to the waste exceeding its 1-year accumulation start date that their waste must be added to the STP. The Waste Generators must provide the following:

- for MLLW and MTRU waste, an explanation as to why the waste will exceed its 1-year accumulation start date; and
- for MLLW only, compliance milestone dates when waste will be shipped off-site for treatment and disposal.

3.4.3 Radioactive Waste Management Basis

For Radioactive Waste, the FOD or RLM must submit [Form 2107](#), *Radioactive Waste Management Basis Report Form* (RWMB) to WM-DO. The Waste Generator must submit an updated [RWMB](#) to WM when there are changes in facility operations or waste status. For assistance in completing the [RWMB](#), contact WM-DO. The LANL [RWMB](#) consists of

- identification of the generating process owner;
- identification of every area where radioactive waste is generated;
- identification of waste management activities;
- reference to documents that support the [RWMB](#);
- institutional documents applicable to waste management;
- waste authorization basis documents pertinent to the waste generating facility;
- waste management processes within the facility and their locations;

- waste matrix (solid or liquid);
- waste categories generated, i.e., LLW, MLLW, TRU, and MTRU;
- volumes of generated waste by matrix, category, and annual estimates;
- characterization methods for each waste stream;
- how waste certification is protected when waste is transported;
- how waste certification is protected during waste storage;
- how the waste management quality assurance program protects waste certification; and
- proposed disposition for each waste stream (reported under “Life-Cycle Waste Management”).

WM-DO then reviews, edits, and forwards the RWMB to the DOE Field Element Manager for review and approval. WM-DO monitors compliance and is responsible for reporting the status of compliance to the DOE Field Element Manager. If WM-DO detects radioactive waste activities that were not included in the RWMB, WM-DO will notify the FOD or RLM to submit an updated [RWMB](#) with a description of the newly identified activities. DOE will not approve radioactive waste management activities that were not included in the RWMB, and may terminate the activities if not reported.

WM-DO may allow facilities to generate radioactive waste without continuous updates to the RWMB, e.g., remedial projects, superfund projects, etc., so long as

- the facilities (1) are performing work in accordance with [EP-DIR-SOP-10021](#), *Characterization and Management of Environmental Programs Waste* and (2) have provided WM-DO a completed and signed Waste Characterization Strategy Form (WCSF); and
- WM-DO has approved the work being performed at the facility and DOE concurrence has been obtained by WM-DO.

3.4.3.a Storage Extension Requests

If a determination is made that radioactive waste cannot be shipped for final disposition within one year of waste generation, the FOD or RLM (or Facility Point of Contact) must submit a request for storage extension to WM-DO at least three months before exceeding the one year expiration of the date the container was sealed. The storage extension request must be submitted by e-mail an updated RWMB that contains

- a checked box, “Extension Request;”
- a specific description of the waste;
- a specific description of the location of the waste;
- the specific length of time it will take to dispose of the waste; and
- the reason the extension is needed.

After reviewing the request, WM-DO will send a letter to the DOE Field Element Manager at least 60 days prior to the storage expiration requesting DOE approval for continued storage. If DOE approval has not been received and the waste is nearing the storage expiration, the Waste Generator must notify [WM-DO](#) via e-mail at least three days prior to the expiration date that DOE approval has not been received. If approval for extension is not granted, DOE will provide direction back to WM-DO.

Note: If WM-DO discovers that an extension request was never submitted, WM-DO will initiate a PFITS issue in accordance with [P322-4](#), *Laboratory Performance Feedback and Improvement Process*.

3.4.4 Processing Waste at Treatment and Storage Facilities (TSFs)

Waste processing at TSFs is conducted within storage units and includes all activities that require opening of a container after it has been characterized and sealed, including but not limited to sorting, segregating, repacking, and resizing of waste. TSFs cannot engage in any sorting, segregating, repackaging, or resizing activities that involve the addition of any new material (e.g., sorbents, inert materials, secondary waste) or an activity that could potentially change the chemical or physical composition of the waste (i.e., that could constitute “waste treatment”). These activities at TSFs must be described in the [LANL Hazardous Waste Facility Permit](#) or a permit modification is required. If processing will require a change to the physical, chemical or biological character or composition of the waste, or any secondary material will be added to the waste, a permit modification may be required and Environmental Protection-Compliance Programs ([ENV-CP](#)) must be contacted via e-mail. Waste processing activities are conducted in the areas outlined in [ADESH-TOOL-810](#), *Waste Processing at Permitted Units*.

3.4.5 Treating Waste

Waste Generators and TSFs cannot engage in waste “treatment” activities unless one of two conditions exist

- the waste treatment is authorized under the [LANL Hazardous Waste Facility Permit](#); or
- the waste treatment is exempt from permitting requirements.

Waste treatment, as broadly defined, includes “any method ... or process ... designed to change the physical, chemical, or biological character or composition of any hazardous waste so as to neutralize such waste, or so as to recover energy or material resources from the waste, or so as to render such waste nonhazardous; less hazardous; (or) safer to transport, store, or dispose of” ([40 CFR Section 260.10](#), *Hazardous Waste Management System: General, Definitions*). Waste treatment may be conducted under the [LANL Hazardous Waste Facility Permit](#) or interim status documents as outlined in the following:

- [ADESH-TOOL-903](#), *TA-55 Storage in Tanks and Treatment by Stabilization*;
- [ADESH-TOOL-904](#), *Treatment by Open Burning*; and
- [ADESH-TOOL-905](#), *Treatment by Open Detonation*.

All LANL workers and subcontractors must contact ENV-CP prior to engaging in an activity that may constitute waste treatment (e.g., addition of sorbents or evaporation). Requirements for other permit exempted treatment that do not have specific location requirements (i.e., Waste Generator areas or TSFs), are found in [ADESH-TOOL-901](#), *Elementary Neutralization* and [ADESH-TOOL-902](#), *Absorption without a Permit*.

3.5 Shipping Waste

Once the waste is ready for shipment, the Waste Generator must contact the [WCO](#), who serves as the LANL Point of Contact for the off-site receiving facility and the Los Alamos Field Office. The WCO reviews the appropriate documentation pertaining to the off-site receiving facility and/or the Los Alamos Field Office, such as the TSDF waste profiles, DOE profiles, subcontracts, etc.

3.5.1 Shipments of Radioactive Waste to Non-Department of Energy (DOE) Treatment, Storage, and/or Disposal Facilities (TSDFs)

If a Waste Generator would like to send waste to a facility that is not owned or operated by DOE, the Laboratory must obtain an “exemption request for direct off-site shipment of Radioactive Waste to Non-DOE and TSDFs” (DOE O 435.1 Exemption Request). To obtain this exemption, the Waste Generator must send an e-mail to [WM-DO](#) identifying

- the specific waste stream with background description (including radioactivity);
- the exact location and volume of waste to be generated or placed in a container; and
- the length of time needed to complete the project’s waste disposition.

WM-DO reviews the e-mail and coordinates the shipment with appropriate LANL workers, organizations and subcontractors. WM-DO and LANL’s shipping subcontractor prepare the DOE O 435.1 Exemption Request, which includes a cost analysis and description of the Waste Generator’s request. WM-DO then submits the final DOE O 435.1 Exemption Request to the DOE Los Alamos Field Office.

The DOE Los Alamos Field Office will review WM-DO’s submittal and evaluate the request. If approved, the DOE Los Alamos Field Office will forward the request to DOE Headquarters. WM-DO will be notified if the request has been approved by DOE. If notification is not received within 15 working days from WM-DO’s submittal to the DOE Los Alamos Field Office, WM-DO will contact the DOE Los Alamos Field Office for a documented response.

3.6 Disposing Waste

LANL does not have on-site disposal capacity for RCRA, TRU, or MLLW wastes. LANL retains limited capacity for on-site disposal for LLW under special circumstances and with prior approval from [WM-DO](#). WM-DO will determine the optimal disposal path for each waste stream in consultation with its disposal subcontractor(s) and DOE and based on a cost benefit analysis of available options. Primary consideration will be given to off-site DOE TSDFs, commercial TSDFs approved by DOE, and on-site disposal respectively.

All waste shipments (on-site and off-site) must be coordinated through [WM-DO](#). This process supports waste certification to final TSDF destination.

3.7 LANL’s Oversight of Waste Management

Compliance oversight at LANL occurs throughout the life-cycle of waste planning, minimization, generation, characterization, accumulation, packaging, management and disposition. ENV-CP provides guidance on DOE Directives and State Regulatory requirements. Waste management operations, including waste certification, are conducted by WM-DO to meet additional requirements from DOE Directives. Internal assessments and external inspections are performed to ensure institutional waste management compliance is met and waste certification is maintained.

3.7.1 Certification Assessments for All Waste Types

To certify that facility waste operations are in accordance with [WM-PROG-QP-250](#), *Radioactive Waste Facility Certification*, and [ADESH-TOOL-300](#), *General Radioactive Waste Management*, WM-DO performs compliance assessments at a facility level against [DOE O 435.1](#), *Radioactive Waste Management*, [DOE M 435.1](#), *Radioactive Waste Management Manual*, RCRA regulations, and this document. These assessments are documented in an Independent Assessment report in

accordance with [P328-2, Independent Assessment](#), and distributed to the FOD, RLM and participants after the assessment has been completed.

Assessments include, but are not limited to

- an effectiveness evaluation to determine the nature of any pre-existing problems. When pre-existing problems are found, the assessment team reviews corrective actions that have been taken and determines whether the corrective actions are effective for continuous quality improvement;
- an evaluation of registered waste areas for waste certification compliance. RCRA corrective actions and opportunities for improvement must be reported to Environmental ENV-CP;
- an inspection of the registered waste area and review of the inspection records;
- a tracking and review of past corrective actions resulting from independent assessments conducted by other LANL organizations, DOE, or their contractors, if possible and;
- a review of nonconformance and corrective action documentation and, when appropriate, an action plan to periodically monitor facilities to ensure appropriate corrective actions are being taken.

WM-DO must notify the FOD and RLM in advance of upcoming site visits and assessments. Registered waste area information will be recorded and tracked in a database managed by ADESH.

3.7.2 LANL Self-Assessment

DOE and NMED expect LANL to assess compliance of the Waste Generator's waste management activities and TSF permit compliance. Waste Generator assessments include but are not limited to, accumulation and registered waste areas, LANL inspection forms, containers or tanks, labels, time limits, worker health and safety practices, and the Waste Generator's records and training records. Compliance evaluations routinely include sites outside registered areas (see the ADESH-FSD for requirements on various registered waste areas including TSF requirements). Assessments of registered waste areas are performed by WM-DO and ENV-CP in addition to periodic Independent Assessments (see [P328-2, Independent Assessment](#)) and Management Assessments (see [P328-3, Management Assessment](#)).

Waste Generators and TSFs must retain waste documents and records in accordance with [PD1020, Document Control and Records Management](#).

3.8 Waste Certification

The LANL Waste Certification Program was developed, documented and implemented to ensure that the waste acceptance requirements of off-site facilities receiving waste for storage, treatment, and disposal are met. LANL waste management components that are provided complex wide support waste certification.

Waste certification is a process by which a Waste Generator affirms that waste meets the waste acceptance criteria of the off-site facility to which the Waste Generator intends to transfer the waste for treatment, storage, and disposal. As such, LANL's Waste Certification Program includes the waste certifying process from generation to disposition (cradle-to-grave) for all regulated wastes. Identifying, characterizing and recharacterizing waste with consideration for associated hazards and signing the WSP certification statement is conducted by the Waste Generator and WMC. Assuring compliance performance includes waste verification, storage certification, packaging certification, data management, and STP and RWMB reporting. Finally, preparing waste for shipment, disposal acceptance, final disposition and on-going assessments completes LANL's Waste Certification Program.

Waste certification includes WM-DO providing oversight of Waste Generator activities to meet the requirements of this document and the waste acceptance criteria of the receiving TSDF. LANL's Waste Certification Program includes compliance for all waste types. Fig. 2 illustrates key components of LANL's Waste Certification Program.



Fig. 2. Key components of the LANL Waste Certification Program

4.0 RESPONSIBILITIES

4.1 Facility Operations Director (FOD)

- If needed, issues local-level procedures for waste management activities in accordance with Section 3.1.
- Routes local level procedures through review and approval process adopted by WM-DO.
- Ensures completion and management of their facility's *Radioactive Waste Management Basis Report* (RWMB [Form 2107](#), *Radioactive Waste Management Basis Report Form*).

4.2 Responsible Line Manager (RLM)

- Participates and encourages others' participation in WM-DO's assessment for facility certification.
- Assists in the management and implementation of corrective actions, findings and opportunities for improvement regarding their facilities.
- Ensures waste management compliance at their facilities.

4.3 Waste Management Division Leader

- Ensures waste management compliance processes are implemented across the Laboratory.
- Ensures waste management oversight processes are implemented.

- Acknowledges the process by which local waste management procedures are reviewed and approved before they are issued or implemented.
- Initiates the review of waste characterization documentation by subject matter experts when new information or discrepancies in waste characterization are discovered.
- Monitors work in progress and conducts effectiveness evaluations (i.e., through facility assessment and waste verification).
- Documents compliance or noncompliance with characterization/certification requirements.
- Identifies the facility's waste management quality assurance program and how it protects waste certification and the proposed disposition for each waste stream.
- Performs re-evaluation and verification of characterization information for facilities' waste generation operations.
- Evaluates corrective actions regarding waste management as timely or untimely.
- Reports corrective action regarding waste management adequacy to management.
- Provides notification to facility RLMs of the status and performance of activities under assessment.
- Documents facility waste certification reviews resulting from internal (e.g., Authorization Authority) or external (e.g., DOE) audits and assessments, tracking corrective actions and reporting observations to management.
- Determines whether waste management staging/storage facilities and systems are adequate to certify waste and to maintain waste certification until shipment.
- Ensures LLW/MLLW waste containers are certified by a qualified Waste Package Certifier (WPC).
- Completes receiving facility documentation and notifications for LANL.
- Maintains LANL facility operations certification and off-site receiving facility certification.
- Provides WCO disposition approval for final TSDF destination.
- Performs LANL Self Assessments of radioactive waste staging and storage areas in accordance with Section 3.7.2.
- Ensures that the WCO and designees certify waste for disposition to off-site TSDFs.
- Performs annual verification of the waste characterization of one percent of the total number of hazardous waste streams characterized solely by acceptable knowledge and managed at TA-54 in the previous calendar year.
- Provides notification and reporting to regulatory oversight bodies.
- Provides WMC qualification training.

4.4 Waste Management Coordinators (WMCs)

- Certify waste for storage in LANL's registered storage areas.
- Verify waste containers or tanks meet the requirements for transfer into storage at their facility or verify waste can be transferred to a TSF or TSDF.

- Ensure waste characterization and acceptable knowledge documentation is accurate, defensible, and complete.
- Ensure waste meets accepting facility WAC and follows the ADESH-FSD processes.
- Ensure the WSP is completed and submitted in WCATS.
- Support Waste Generators in internal assessments and external inspections.
- Ensure waste containers are closed in accordance with manufacturer's instructions prior to shipment.
- Ensure waste container or tank is adequate to protect the waste against external sources of contamination, and ensure waste management integrity and compatibility.

4.5 Environmental Protection - Compliance Programs (ENV-CP) Group Leader

- Directs the waste management compliance process.
- Coordinates information and compliance requests and activities with regulators.
- Manages the ADESH-FSD collection.
- Receives information on RCRA corrective actions and opportunities for improvement from WM-DO's assessment of facility certification.
- Ensures that LANL Self Assessments in accordance with Section 3.7.2 are performed.
- Assists WM-DO by providing regulatory information and institutional guidance on waste management requirements.
- Maintains the [LANL Hazardous Waste Facility Permit](#) and is responsible for developing permit modification requests.

4.6 Waste Generators

- Comply with the requirements in this document and other requirements documents referenced herein.
- Characterize waste pursuant to the requirements in this document and the ADESH-FSDs.
- Before waste is generated and/or packaged, conduct waste avoidance or minimization analysis in consultation with the WMC.
- Ensure adequacy of the documentation used for waste characterization (acceptable knowledge and physical/chemical analysis).
- Maintain registered waste areas within their span of control.
- Manage on-site storage as required in this document.
- Initiate the WSP.
- Notify the [STP Manager](#) via e-mail, at least three months prior to the waste exceeding its 1-year accumulation start date that their waste must be added to the STP.

5.0 IMPLEMENTATION

The requirements in this document are effective on the issue date. All ADESH FSDs that are referenced in this document will be reviewed and updated by December 31, 2015, in accordance with [ADESH-AP-007](#), *Document Control* and [PD311](#), *Requirements System and Hierarchy*. The FSDs will be reviewed and updated on a three year schedule beginning with the issue date of P409, Rev.5.

6.0 TRAINING

The training courses listed in this section are required for all workers who generate waste (except office trash) and workers who manage waste or work at TSFs. Workers must notify their managers of expired training. Unless specified, there is no grace period for the training requirements below; this training must be completed and kept current.

Note: Site-specific training may be required and directed by RLMs.

6.1 Waste Generators and WMCs must complete:

- [Course #23263](#), *Waste Generation Overview Live*; and
- [Course #21464](#), *Waste Generation Overview Refresher SS*, every three years.

6.2 Persons who work in, or are owners of, less-than-90-day waste accumulation areas must complete:

- [Course #7488](#), *RCRA Personnel Training*, and
- [Course #28582](#), *RCRA Refresher (Self-Study)*, every twelve months.

Note: The RCRA-related training listed above must be completed within six months of employment or new assignment; during this period, workers must work under the supervision of a trained worker.

6.3 Persons who work in TSFs must complete:

- [Course #7488](#), *RCRA Personnel Training*;
- [Course #28582](#), *RCRA Refresher (Self-Study)*, every twelve months; and
- [Course #23263](#), *Waste Generation Overview Live*.

Note: The RCRA-related training listed above must be completed within six months of employment; during this period, workers must work under the supervision of a trained worker.

6.4 Remediation Workers must complete:

- [Course #23263](#), *Waste Generation Overview Live*;
 - [Course #4464](#), *HAZWOPER: General Site Worker*, or [Course #4465](#), *HAZWOPER: Limited Site Worker*;
 - [Course #28652](#), *HAZWOPER: Refresher*, every twelve months;
 - [Course #7488](#), *RCRA Personnel Training*;
 - [Course #28582](#), *RCRA Refresher (Self-Study)*, every twelve months; and
- or other courses as assigned by the supervisor.

7.0 EXCEPTION OR VARIANCE

Changes in the processes conducted at the TSF or changes to the TSF structure must be reviewed by ENV-CP for necessary permit modifications. Hazardous waste treatment activities that are not authorized by the [LANL Hazardous Waste Facility Permit](#) or interim status documents must be reviewed by ENV-CP for regulatory compliance.

8.0 DOCUMENTS AND RECORDS

8.1 Office of Record

The Policy Office is the Laboratory Office of Record for this Institutional Document and maintains the administrative record.

8.2 Waste Management Records

WM-DO and ENV-CP work with Waste Generators, FODs and RLMs to ensure that the following records and documentation are kept in accordance with [PD1020](#), *Document Control and Records Management*:

- WCATS for waste characterization
- [Form 2107](#), *Radioactive Waste Management Basis Report Form*
- *RWMB Storage Extension Request*
- DOE O 435.1, *Exemption Request*
- STP plan and correspondence to and from NMED
- Independent Assessment Reports
- Trend analysis on waste management data
- ADESH database containing [Registered Waste Area](#) information
- Inspection Forms

9.0 DEFINITIONS AND ACRONYMS

9.1 Definitions

See LANL [Definition of Terms](#) and [ADESH-TOOL-101](#), *Waste Management Glossary*.

9.2 Acronyms

See LANL [Acronym Master List](#).

ADESH	Associate Director for Environment, Safety, and Health
AP	Administrative Procedures
DEAR	Department of Energy Acquisition Regulation
DOE	Department of Energy
DOT	Department of Transportation
ENV-CP	Environmental Protection-Compliance Programs
EPA	Environmental Protection Agency
ER	Environmental Restoration
FOD	Facility Operations Director
FSD	Functional Series Documents
IA	Issuing Authority
LANL	Los Alamos National Laboratory
LLW	Low-Level Waste
M	Manual
MLLW	Mixed Low-Level Waste

MSDSs	Material Safety Data Sheets
MTRU	Mixed Transuranic
NCR	Nonconformance Report
NMED	New Mexico Environment Department
NNSS	Nevada National Security Site
O	Order
OP	Operating Tools
PFITS	Performance Feedback and Improvement Tracking System
PRID	Permits and Requirements Identification
PM	Project Management
RCRA	Resource Conservation and Recovery Act
RLM	Responsible Line Manager
RM	Responsible Manager
RO	Responsible Office
RWMB	Radioactive Waste Management Basis
SBP	Safety Basis Procedure
SOP	Standard Operating Procedure
STP	Site Treatment Plan
TP	Technical Procedure
TRU	Transuranic
TSCA	Toxic Substances Control Act
TSDF	Treatment, Storage, and/or Disposal Facility
TSFs	Treatment Storage Facilities
WAC	Waste Acceptance Criteria
WAP	Waste Analysis Plan
WCATS	Waste Compliance and Tracking System
WCO	Waste Certification Official
WCSF	Waste Characterization Strategy Form
WSP	Waste Stream Profile
WM	Waste Management
WMC	Waste Management Coordinator
WM-DO	Waste Management-Division Office

10.0 HISTORY

Revision History		
03/27/08	P409, Rev. 0	Initial Issue. This document and its linked Waste Management Tools replaces and cancels the Laboratory Implementation Requirements (LIRs) and Laboratory Implementation Guidance (LIG) listed below. The LIRs will remain in force and effect for each nuclear facility until that facility completes the Unreviewed Safety Question (USQ) or Unreviewed Safety Issue (USI) review determinations. ▪ LIG 404-00-02, <i>Acceptable Knowledge Guidance</i>

Revision History		
		<ul style="list-style-type: none"> ▪ LIR 404-00-02, <i>General Waste Management Requirements</i> ▪ LIR 404-00-03, <i>Hazardous and Mixed Waste Requirements</i> ▪ LIR 404-00-04, <i>Managing Solid Waste</i> ▪ LIR 404-00-05, <i>Managing Radioactive Waste</i> ▪ LIR 404-00-06, <i>Managing Polychlorinated Biphenyls</i>
05/22/08	P409, Rev. 1	Section 6.0 Training: Changed Waste Profile Form Signers to Waste Generators and removed Waste Documentation Forms from the Waste Generators list.
06/04/10	P409, Rev. 2	Extensive revision: Clarified training requirements and responsibilities, corrected links to tools, clarified tool creation process, and simplified the document.
03/19/12	P409, Rev. 3	<p>This document cancels RN0808, <i>Requirements for Recycling Metal from Areas posted for Radiological Hazards</i>.</p> <p>Section 6.0: Separated the third bullet into two bullets, reflecting the separate training requirements for persons who work in Treatment, Storage, and/or Disposal Facilities (TSDFs) and Remediation Workers, to align with the Laboratory's Hazardous Waste Permit. Added Course #23263, Waste Generation Overview Live, as a training requirement for persons who work in TSDFs and Remediation Workers.</p>
04/10/13	P409, Rev. 4	<p>Removed references to cancelled Form 1346, <i>Waste Profile Form</i>, which has been replaced by the Waste Stream Profile (found in the Waste Compliance and Tracking System (WCATS)).</p> <p>Section 5.0: Updated to reflect effective date of May 28, 2013 for applicable nuclear, high- and moderate-hazard facilities and accelerators.</p> <p>Performed three year review in accordance with PD311, Requirements System and Hierarchy.</p> <p>Updated links, titles, and acronyms.</p>
07/30/15	P409, Rev. 5	<p>Performed three-year review in accordance with PD311, Requirements System and Hierarchy.</p> <p>This document cancels P930-2, <i>Radioactive Waste Certification Program</i> and P930-3, <i>Off-Site Shipment of Chemical, Hazardous, or Radioactive Waste</i>. Although this is not “a new document,” it is a complete re-write of P409, Rev. 4 as the requirements from P930-2 have been merged with this document. P409 title has also changed to “LANL Waste Management.”</p>

11.0 REFERENCES

[Prime Contract:](#)

- DEAR 970.5223-1, Integration of Environment, Safety, and Health into Work Planning and Execution (Dec. 2000)
- Part II, Section H-83 (DEAR 5223-1)
- Part III, Section J, Appendix B 4.2

LANL

P409, Rev. 5

Effective Date: 07/30/15

- Part III, Section J, Appendix G
- Appendix B, Statement of Work: §1.0 General
- [DOE O 435.1](#), *Radioactive Waste Management*
- [DOE M 435.1-1](#), *Radioactive Waste Management Manual*
- [DOE O 436.1](#), *Departmental Sustainability*
- [40 CFR Section 260.10](#), *Hazardous Waste Management System: General, Definitions*
- [DOE O 458.1](#), *Radiation Protection of the Public and the Environment*

11.1 Other References

- [LANL Hazardous Waste Facility Permit](#)
- [P930-1](#), *LANL Waste Acceptance Criteria*
- [Resource Conservation and Recovery Act \(RCRA\)](#)
- [Toxic Substances Control Act \(TSCA\)](#)
- [New Mexico Special Waste Act](#)
- [74-9-1 NMSA 1978](#), *Solid Waste Act*
- [74-4-1 NMSA 1978](#), *Hazardous Waste Act*
- [PD311](#), *Requirements System and Hierarchy*
- [ADESH-AP-007](#), *Document Control*
- [SBP-112-3-R1.2](#), *Unreviewed Safety Question (USQ) Process*
- [P315](#), *Conduct of Operations Manual*
- [ADESH-TOOL-213](#), *No Owner Waste*
- [ADESH-TOOL-114](#), *Office Waste Tool*
- [ADESH-TOOL-111](#), *Waste Characterization*
- [ADESH-TOOL-314](#), *Radioactive Characterization*
- [PD400](#), *Environmental Protection*
- [Waste Compliance and Tracking System \(WCATS\)](#)
- [ADESH-TOOL-306](#), *Potentially Radioactive or Mixed Investigation-Derived Waste*
- [P411](#), *Authorized Release Limits Proposal Process*
- [RP-SOP-077.004](#), *LANSCE Metals Clearance Process*
- [RP-SVS-RIC-TBD-03](#), *Technical Basis Documentation Regarding Health Physics Measurements for the Unrestricted Release of Metals from LANSCE*
- [WM-PROG-QP-236](#), *Waste Certification Program Waste Verification*

- [ADESH-TOOL-600](#), Certification, Documentation, Shipment of ChemHaz
- [ADESH-TOOL-206](#), Hazardous Waste
- [300 Series Tools](#), (Radioactive Waste)
- [400 Series Tools](#), (Universal Waste)
- [500 Series Tools](#), (NM Special Waste)
- [ADESH-TOOL-712](#), Polychlorinated Biphenyl (PCB) Waste
- [ADESH-TOOL-716](#), Used Oil for Recycle
- [800 Series Tools](#), (Treatment, Storage and Disposal Facilities)
- [ADESH-TOOL-300](#), General Radioactive Waste Management
- [EP-DIR-SOP-10021](#), Characterization and Management of Environmental Programs Waste
- [P322-4](#), Laboratory Performance Feedback and Improvement Process
- [ADESH-TOOL-810](#), Waste Processing at Permitted Units
- [ADESH-TOOL-903](#), TA-55 Storage in Tanks and Treatment by Stabilization
- [ADESH-TOOL-904](#), Treatment by Open Burning
- [ADESH-TOOL-905](#), Treatment by Open Detonation
- [ADESH-TOOL-901](#), Elementary Neutralization
- [ADESH-TOOL-902](#), Absorption without a Permit
- [WM-PROG-QP-250](#), Radioactive Waste Facility Certification
- [P328-2](#), Independent Assessment
- [P328-3](#), Management Assessment
- [PD1020](#), Document Control and Records Management
- [PD311](#), Requirements System and Hierarchy
- [ADESH-TOOL-101](#), Waste Management Glossary

12.0 FORMS

[Form 2107](#), Radioactive Waste Management Basis Report Form

13.0 ATTACHMENTS

There are no attachments associated with this document.

14.0 CONTACT

Waste Management Division Office

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Fax: (505) 667-1945

Website: <http://int.lanl.gov/org/padops/adesh/waste-management/index.shtml>

IMPORTANT

If you wish to receive credit for the preceding document you **must** enter the course through [UTrain](#) **not** the Policy Office website.