Inspect Waste Management Areas

Tank Farm Plant Operating Procedure Effluent Treatment Facility

USQ Not Required – ETF is a < Hazard Category 3 Radiological Facility

<table>
<thead>
<tr>
<th>Rev-Mod</th>
<th>Release Date</th>
<th>Justification</th>
<th>Summary of Changes</th>
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<td>A-8</td>
<td>03/29/2018</td>
<td>Update references</td>
<td>Update references for RCRA surveillances.</td>
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<tr>
<td>A-7</td>
<td>10/09/2017</td>
<td>Process Improvement</td>
<td>Updated purpose and scope sections. Updated terms and definitions. Updated Section 5.2 special instructions for weekly inspections.</td>
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<tr>
<td>A-5</td>
<td>07/25/2017</td>
<td>MOP changes</td>
<td>Update to Section 1. Added to terms and definitions. Created general information section (2.2). Added steps to Section 5.2 for increased clarity. Changed attachment 1 and 2 into site forms. Updated records section for site forms. Added a table for waste inspection locations. Added table for waste segregation information.</td>
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<td>A-4</td>
<td>12/14/2016</td>
<td>Operation request –Formatting Changes</td>
<td>Formatting changes in Attachment #1 table. Added new rows, split table into 3 pages vs 2 pages.</td>
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1.0 PURPOSE AND SCOPE

1.1 Purpose

This procedure provides instructions for conducting weekly field inspections of waste containers and waste management (storage/accumulation) areas at ETF, including interior and exterior container storage areas at 2025E/2025EA/2025ED, LERF, as well as the TEDF pump stations. Wastes covered by this procedure may be regulated by DOE 435.1, as radioactive waste and/or Washington Administrative Code (WAC) WAC-173-303 and the facility RCRA permits.

Weekly waste management area inspections and monthly satellite area/universal recycle waste area inspections are necessary to identify waste container problems caused by deterioration or human error, and ensure regulatory requirements are met. Such problems may cause or lead to a release to the environment or pose a threat to human health, or put the facility at risk of a regulatory noncompliance.

1.2 Scope

This procedure involves field inspections for ETF waste storage areas, which include ETF interior and exterior waste container storage areas.

This procedure addresses weekly inspections which are required for the TSD and 90-day accumulation areas, as well as monthly inspections required for Universal Waste (UW)/Recycle Waste and Satellite Accumulation Areas (SAA).

The ETF facility does not store TSCA PCB waste greater than 50 ppm; therefore this procedure does not address PCB inspections. If TSCA regulated PCB waste 50 ppm is received at the facility, a separate inspection for PCB wastes will be established. The ETF facility does receive PCB remediation waste in the form of secondary liquid waste input through the LERF basins. The waste is considered a TSCA PCB remediation waste for disposal, but is exempted from the storage, marking, labeling, and inspection requirements if the concentration of the CPB’s is < 50 ppm (40 CRF 761.61).

The WAC-173-303-320(c) requirement to perform daily inspection of the facility areas subject to spills is covered in ETF Daily Operator Rounds; ETF-OR-DR-CR, ETF-OR-DR-MTT, ETF-OR-DR-STT, and ETF-OR-DR-OOR.
2.0 INFORMATION

2.1 Terms and Definitions

- Accumulation Area – The accumulation area is a designated location(s) in which waste are managed. The Accumulation dates are as follows:
  - LLW – when the container is full and waste will no longer be added
  - 90-day accumulation area – when waste is first added to the container
  - Hazardous/mixed waste outside of SAA – when waste is first added to the container, or the oldest date for waste over-packed into the container (i.e., soft-sided container added to roll off on TSD).
  - SAA – when the container is full and waste will no longer be added.
- Active Container – Any container that is collecting universal waste, recycle waste, hazardous waste, radioactive low-level or mixed waste. Active containers do not include empty containers or those that have been shipped for disposal.
- Combustible materials – tumble weeds, trash, paper. Material stored or used in waste management area for waste packaging that is appropriately stored or staged for work, such as absorbent pads, bags, are excluded from the combustible material check.
- EFR – Environmental Facility Representative
- HW – Hazardous Waste
- LLW – Low Level Waste
- LLMW – Low Level Mixed Waste
- SAA – Satellite Accumulation Area
- SWITS – Solid Waste Information and Tracking System
- TSD – Treatment, Storage, and Disposal
- UW – Universal Waste.

2.2 General Information

2.2.1 The SWITS R103 Generator Inspection Worksheet is used along with the inspection checklist and must be submitted as a record with the corresponding Weekly Waste Area Inspection Checklist.

2.2.2 Unknown wastes shall be managed in accordance with ETF-65D-003.

2.2.3 Universal waste SHALL NOT be accumulated for longer than nine months per waste stream.

2.2.4 90-day area waste SHALL NOT be accumulated for longer than 70 days before moving to a TSD approved storage area.

2.2.5 TSD waste shall not be accumulated for more than 330 days before processing for shipment.
3.0 PRECAUTIONS AND LIMITATIONS

3.1 Radiation and Contamination Control

3.1.1 Work in radiological areas will be performed using a radiological work permit following review by Radiological Control per ALARA Work Planning procedure, TFC-ESHQ-RP_RWP-C-03.

3.2 Environmental Compliance

3.2.1 In the event of a spill/leak/release, notify the SOM/FWS and respond per ETF-ERP-85B-003, Emergency Spill or Release at ETF.
4.0 PREREQUISITES

4.1 Special Tools, Equipment, and Supplies

The following supplies may be needed to perform this procedure:

- Protective clothing per applicable RWP
- Tape Measure (for aisle space)
- Weather resistant permanent ink pen/marker
- Leather gloves and shoes/boots with a protective toe cap if moving drums
- Spill kit containing the following must be available to quickly address cleanup of spills or leaks:
  - Uni-Safe (MSDS/SDS #060370)
  - Spill-X-A Agent (MSDS/SDS #018679)
  - Spill-X-C Agent (MSDS/SDS #018945A)
  - Sodium Bicarbonate (MSDS/SDS #071383)
  - Haz-Mat PIG Mat (MSDS/SDS #035629)
  - Oil-Only PIG Absorbents (MSDS/SDS #027539).

4.2 Performance Documents

The following documents may be needed to perform this procedure:

- ETF-ERP-85B-003, Emergency Spill or Release at ETF
- Site form, A-6007-334, Weekly Waste Area Inspection Sheet
- Site form, A-6007-335, Monthly SAA and Universal/Recycle Waste Area Inspections
- Solid Waste Information and Tracking System (SWIR103) report
- TFC-ESHQ-ENV_FS-C-01
- TFC-ESHQ-Q_C_C-01.
5.0 PERFORMANCE

Special Instructions

Sections in this procedure may be performed concurrently or out of order, as directed by the SOM, unless specifically noted before a particular task.

Section 5.1 will be performed only as needed to address leaks and spills.

NOTE - Table 1 has a list of all locations for inspections.

5.1 Instructions for Leaks/Spills

5.1.1 RESPOND to leaks per spill response procedure ETF-ERP-85B-003.

5.1.2 IMMEDIATELY REPORT all leaks to CRO, HPT, and SOM.

5.2 Inspect Waste Management Areas

Special Instructions

Weekly inspections are required to be completed at least once every seven days and not more than six calendar days between inspection dates.

The monthly inspection is required to be completed once per calendar month.

NOTE – Solid Waste Information System (SWITS) access is assigned through the SWITS administrator (A-6006-196).

5.2.1 IF performing weekly inspections, OBTAIN SWITS (SWIR103) report from Waste Technical Services

OR

COMPLETE the following:

5.2.1.1 OPEN the SWITS screen.

5.2.1.2 OPEN SWITS Menu, M008 Main Reports Menu and R100 Generator Reports Menu.

5.2.1.3 SELECT R103 Generator Inspection Worksheet.

5.2.1.4 ENTER “200LEF” for GEN GROUP.

5.2.1.5 ENTER “200LEF” for Facility.

5.2.1.6 CLICK Run Report AND PRINT.
5.2 Inspect Waste Management Areas (Cont.)

5.2.2 IF performing monthly SAA/UW/Recycle Inspection, OBTAIN Site Form A-6007-335.

5.2.2.1 PERFORM inspections using checklist.

5.2.3 RECORD “N” AND CIRCLE in red ink each question that is not in compliance.

5.2.4 RECORD “NW” (no waste) for areas without waste or waste containers.

Special Instructions

Non-compliance of a RCRA-required inspection requires notifications be made. (“RCRA” entries on inspection sheets identify those inspections required by the LERF and 200 Area ETF unit-specific portion of the RCRA permit).

5.2.5 IF a RCRA-required entry is found out of compliance and endangers human health or the environment, IMMEDIATELY NOTIFY Central Shift Manager of the non-compliance AND REQUEST they contact Environmental On-Call per TFC-ESHQ-ENV_FS-C-01 (Environmental On-Call is responsible for calling Ecology).

5.2.6 FOR any RCRA non-compliance, NOTIFY the EFR and DA by phone or email (no EFR or DA response is required).

5.2.7 RECORD corresponding deficiencies on Site Form (A-6007-334 for weekly inspections, A-6007-335 for monthly inspection).

5.2.8 RECORD the following information on the Site Form:
- Date and time of inspection
- Name of inspector (signed and printed name required).

NOTE Further information regarding the Problem Evaluation Report (PER) can be found in TFC-ESHQ-Q_C-C-01.

5.2.9 DISCUSS any deficiencies discovered with SOM AND TAKE corrective actions to resolve deficiencies.

5.2.10 RECORD corrective actions on appropriate site form Corrective Actions section.

5.2.10.1 IF “N/A” is used, ENSURE explanation is provided in the comments section.
5.2 Inspect Waste Management Areas (Cont.)

5.2.11 REVIEW inspection sheet for accuracy and completeness AND VERIFY all items listed have been addressed.

5.2.12 SUBMIT the following to SOM/FWS for review and concurrence:
- Site Form A-6007-334 for weekly inspections
- Site Form A-6007-335 for monthly inspections
- SWITS R103 Generator Inspection Worksheet.

5.2.13 (SOM/FWS) REVIEW Site Form (A-6007-334 for weekly inspections, A-6007-335 for monthly inspection) for completeness and corrective actions.

5.2.14 (SOM/FWS) PRINT/SIGN/DATE AND FORWARD to Waste Technical Services for review.

5.2.15 (Waste Technical Services) REVIEW Site Form (A-6007-334 for weekly inspections, A-6007-335 for monthly inspection) for completeness and corrective actions.

5.2.16 (Waste Technical Services) ADD/REMOVE containers in SWITS.

5.2.17 (Waste Technical Services) PRINT/SIGN/DATE AND FORWARD to Environmental for concurrence.

5.2.18 (Environmental) REVIEW Site Form for completeness and corrective actions.

5.2.19 (Environmental) PRINT/SIGN/DATE Site Form.
5.3 Records

5.3.1 **PERFORM** the following for records identified within this procedure.

5.3.1.1 **RECORD** the number of times the record was generated in applicable column

**OR**

**PLACE** a check mark (✓) in the N/A column.

5.3.1.2 **SUBMIT** the package for verification of completed records.

<table>
<thead>
<tr>
<th>Records Submittal Checklist</th>
<th>Number of times completed</th>
<th>N/A (✓)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Site Forms</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Site Form A-6007-334</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Site Form A-6007-335</td>
<td></td>
<td></td>
</tr>
<tr>
<td>SWITS R103 Generator Inspection Worksheet</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**FWS/OE/Shift Manager SEND** the completed records to the Central Shift Office for records retention.

<table>
<thead>
<tr>
<th>Signature</th>
<th>Print (First and Last)</th>
<th>Date</th>
</tr>
</thead>
</table>

The record custodian identified in the Company Level Records Inventory and Disposition Schedule (RIDS), is responsible for record retention in accordance with TFC-BSM-IRM_DC-C-02.
## Inspect Waste Management Areas

### Table 1 – Waste Inspection Locations

<table>
<thead>
<tr>
<th>General Location</th>
<th>Specific Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>Universal Waste Storage Areas</td>
<td>• HS-0011</td>
</tr>
<tr>
<td></td>
<td>• Centralized battery collection containers 2025EA copy room</td>
</tr>
<tr>
<td></td>
<td>• Centralized battery collection containers 2025E lobby.</td>
</tr>
<tr>
<td>Recycle Storage Areas</td>
<td>• Used oil drums 2025E, Room 134</td>
</tr>
<tr>
<td></td>
<td>• Lead acid batteries 219C</td>
</tr>
<tr>
<td></td>
<td>• Aerosol cans – Maintenance shop</td>
</tr>
<tr>
<td>Satellite Accumulation Areas</td>
<td>• HS-0011</td>
</tr>
<tr>
<td></td>
<td>• SOM/WTS will provide information for newly established SAA locations</td>
</tr>
<tr>
<td>90-Day Storage Areas</td>
<td>• 2025E process area</td>
</tr>
<tr>
<td></td>
<td>• LERF</td>
</tr>
<tr>
<td>Treatment Storage and Disposal (TSD)</td>
<td>• 2025E Drum storage area</td>
</tr>
<tr>
<td></td>
<td>• 2025E outdoor TSD storage area</td>
</tr>
<tr>
<td></td>
<td>• 2025ED</td>
</tr>
<tr>
<td>Radioactive Low-Level Waste (LLW) Storage</td>
<td>• LERF basins (horsetrailer)</td>
</tr>
<tr>
<td></td>
<td>• 2025E</td>
</tr>
<tr>
<td></td>
<td>• Outdoor container storage area</td>
</tr>
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</table>
Inspect Waste Management Areas

Table 2 – Waste Segregation Table

For additional guidance, CONTACT WTS.

<table>
<thead>
<tr>
<th>Class or Division</th>
<th>Notes</th>
<th>2.1</th>
<th>2.2</th>
<th>2.3 Gas Zone A</th>
<th>2.3 Gas Zone B</th>
<th>3</th>
<th>4.1</th>
<th>4.2</th>
<th>4.3</th>
<th>5.1</th>
<th>5.2</th>
<th>6.1 Liquids PG I Zone A</th>
<th>7</th>
<th>8 Liquids Only</th>
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<tr>
<td>Flammable gases</td>
<td>2.1</td>
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<tr>
<td>Non-toxic, non-flammable gases</td>
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<tr>
<td>Poisonous gas Zone A</td>
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<td>X</td>
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<td>X</td>
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<td>Flammable liquids</td>
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<td>Dangerous when wet materials</td>
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</tbody>
</table>

Blank Space = No Restrictions
X = Materials may not be loaded or transported together in the same vehicle. Materials may not be stored together in the same room.
O = Materials may be loaded, transported, and stored together but must be separated so that comingling of materials will not occur.