Package Waste

Tank Farm Plant Operating Procedure

Effluent Treatment Facility

Changes “Other Than Inconsequential” Require These Additional Reviews:

Waste Management

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

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1.0 PURPOSE AND SCOPE

1.1 Purpose

The purpose of this procedure is to ensure that waste containers generated at ETF are controlled and maintained in compliance with the requirements of DOE-435.1 Radioactive Waste Management, Washington Administrative Code (WAC) 173-303, TFC-PLN-33, Waste Management Basis, TFC-OPS-WM-C-31, Regulated Waste Generation and Storage, and the Effluent Treatment Facility Resource Conservation and Recovery Act (RCRA) Part B Permit. This procedure provides instructions for issuing, inspecting, tracking, packaging, closing, and storing waste containers at the Effluent Treatment Facility (ETF).

1.2 Scope

This procedure is limited to Low-Level Waste (LLW), Mixed Low-Level Waste (MLLW), hazardous waste, and non-regulated containerized or bulk waste generated at ETF, TEDF, LERF, and SALDS.

The following are outside the scope of this procedure:

- Powder drums (ETF-80C-001)
- The excessing of property
- Sanitary waste from administrative areas
- Universal Waste or recyclable waste (ETF-60K-007)
- Reusable contaminated equipment (TFC-OPS-WM-C-10).

Any activity that will generate waste types beyond the scope of this procedure must have separate waste management methods established prior to generation of waste.
2.0 INFORMATION

2.1 Terms and Definitions

2.1.1 AA - Accumulation Area – The accumulation area is a designated location(s) in which waste are managed.

2.1.2 Accumulation Date – The accumulation start date is required to be written on the item and/or the container. If two or more containers are combined into one container, the oldest accumulation start date applies:
   - Mixed Waste – the date that the waste item was first placed into the container.
   - Hazardous Waste Stored in a Satellite Accumulation Area – date when the container is full.
   - Low-Level Waste – the accumulation date is the container full date.
   - Universal Waste – date of oldest item added to container.

2.1.3 CIN - Container Identification Number from container barcode.

2.1.4 LLW – Low-Level Waste is waste that is radioactive only.

2.1.5 MLLW – Mixed Low-Level Waste.

2.1.6 MW – Mixed Waste is dangerous or hazardous and is radioactive.

2.1.7 PIN – Primary Identification Number.

2.1.8 Regulatory Clock Storage Timeframes:
   - 90 day Accumulation Area – 90 days from the date waste was first placed into the container.
   - TSD Waste – one year from the accumulation date.
   - LLW – one year from the accumulation/full date.
   - SAA – 90 days following the accumulation/full date.
   - UW – 12 months regulatory requirement, however, Waste Technical Services has implemented a 9 month administrative requirement.
2.1 Terms and Definitions (Cont.)

2.1.9 RO/RO – Roll-On/Roll-Off.

2.1.10 SWITS – Solid Waste Information and Tracking System.

2.1.11 UW – Universal Waste – Universal wastes are specific hazardous waste streams that a generator can choose to manage in an alternative manner in place of more complex waste requirements, contributing to waste minimization.

2.1.12 WCIS – Waste Container Inventory Sheet.

2.1.13 WMS – Waste Management Specialist.

2.1.14 WPC – Waste Planning Checklist – Waste Planning Checklist is used to incorporate waste disposition requirements per TFC-OPS-MAINT-C-01, Work Management, and TFC-OPS-WM-C-01.

2.1.15 WTS - Waste Technical Services.
2.2 General Information

2.2.1 Total weight of a container shall not exceed the maximum allowed gross weight indicated on the container.

2.2.2 Any drum containing free liquids must have secondary containment, such as a spill palette, or stored in an area with engineered secondary containment.

2.2.3 Prohibited items listed in Attachment 1 are not allowed in any Low Level Waste (LLW) or Mixed Waste (MW) containers. Hazardous waste items identified on the prohibited items list will be managed on a case-by-case basis outside of this procedure.

2.2.4 The following are prohibited in LLW and non-regulated waste (NON-REG):
- Prohibited item from Attachment 1
- Hazardous and mixed waste
- Pressurized aerosol cans
- Batteries
- Free liquids (absorbed liquids allowed only if inside rigid container with dimensions greater than six inches).

2.2.5 When a container is not actively being loaded, the container must be closed and secured to prevent improper additions of waste.

2.2.6 Chemical hazard determination and proper packaging instructions shall be provided by the Waste Management Specialist (WMS)/Shift Operations Manager (SOM) prior to packaging waste.
2.2 General Information (Cont.)

2.2.7 Waste minimization:

ETF complex personnel will make every effort to reduce or eliminate the toxicity of waste by using less toxic or non-toxic substitutes. In addition, ETF personnel will minimize the generation of waste through source reduction, segregation, minimization, and recycling. Waste minimization is also identified through the use of Waste Planning Checklists. Regulations require that non-hazardous waste is segregated from hazardous waste, and low level waste is segregated from mixed waste.

2.2.8 This procedure provides an instructional checklist for a visual inspection of empty DOT drums for mechanical integrity before each use. All DOT approved containers must be checked for integrity quality control before use.

2.2.9 Figure 1 contains additional information for marking and labeling to ensure seams are visible.
# Package Waste

## 3.0 PRECAUTIONS AND LIMITATIONS

### 3.1 Personnel Safety

3.1.1 If container is found bulging, leaking and/or damaged STOP WORK and notify supervision.

### 3.2 Equipment Safety

3.2.1 Potential fire hazards will be avoided by keeping containers away from heat sources.

3.2.2 Closure requirements for specification packages (UN DOT drums) are mandated by the manufacturer specification of the container.

3.2.3 The gross weight of a shipping container shall not exceed manufacture’s specifications.

3.2.4 Container seams need to be fully visible as part of container inspections.

### 3.3 Radiation and Contamination Control

3.3.1 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.

### 3.4 Environmental Compliance

3.4.1 In the event of a spill/leak/release, IMMEDIATELY NOTIFY the SOM/FWS and respond per ETF-ERP-85B-003, Emergency Spill or Release at ETF.

3.4.2 To meet the requirements of Washington Administrative Code (WAC), Chapter 173-303 *Dangerous Waste Regulations*, spilled or leaked waste must be cleaned up, with the exception of catch tanks, within twenty four hours of detection.

3.4.3 All hazardous wastes must be managed in SAA, 90 day accumulation areas, or TSDs permitted areas.

3.4.4 All hazardous wastes will be labeled “HAZARDOUS WASTE” and will be labeled with the major risk associated with the waste (for example, flammable, corrosive, toxic) and marked with accumulation date.
4.0 PREREQUISITES

4.1 Special Tools, Equipment, and Supplies

The following supplies may be needed to perform this procedure:
- PIN record folders
- Inventory sheet protection envelope
- Signs and labels per Table 1
- Calibrated torque wrench (+/- 2 ft-lbs)
- Torque wrench
- Rubber mallet
- Permanent ink marker (weather resistant)
- Approved DOT container(s) (approved per DOT and CFR Title 49)
- Sealable plastic bag.

4.2 Performance Documents

The following documents may be needed to perform this procedure:
- ETF-02-001, Decontamination
- ETF-60K-001, Operate Waste Storage Areas
- Site Form A-6007-147, Pink Slip Needs Repair
- Site Form A-6007-331, ETF Container Packaging Checklist
- Site Form A-6007-332, ETF Waste Container Inventory Sheet
- Waste Container Inventory Label, pg. 37.
4.3 Field Preparations

NOTE - Any absorbents used in conjunction with this procedure will be identified either by the WMS or in the Waste Planning Checklist.

4.3.1 CONFIRM drum storage pallets have been inspected for the following before use:
- Cracks
- Tears
- Breaks
- Gouges
- Deformities.

4.3.2 ENSURE damaged pallets have been removed from service and disposed of appropriately.

4.3.3 FOR Dangerous/Mixed/Toxic Substance Control Act waste accumulation areas, CONFIRM WTS has performed a walkdown of the area.

4.3.4 ENSURE incompatible materials are not packaged together.
5.0 PROCEDURE

Special Instructions

Sections of this procedure may be performed in any logical order, out of sequence, or in parallel.

Site Form (A-6007-331) must be completed for all containers.

5.1 Determine Waste Type

5.1.1 ENSURE an approved collection area is established for the waste to be generated.

5.1.2 IF a Waste Planning Checklist (WPC) is available, OBTAIN completed WPC copy from the WMS/Work Package.

5.1.3 DETERMINE type of waste to be generated.

5.1.4 IF a container has already been established for the identified waste type, GO TO one of the following Sections:

- Section 5.8, Package/Fill Radioactive Waste (LLW and MLLW) Container
- Section 5.9, Prepare and package Non-Regulated Waste
- Section 5.10, Prepare and Package Hazardous Waste
- Section 5.11, Package-Load Material in RO/RO Container.

5.1.5 IF a new container needs to be established, OBTAIN the container as identified by the SOM or WMS.

5.1.6 IF a new SAA needs to be established, NOTIFY the SOM/FWS and WMS AND

GO TO ETF-60K-001 to set up SAA.
5.2 Container Tracking

NOTE – A Primary Identification Number (PIN)/secondary ID, will be used as the primary package ID when a Container Inventory Number (CIN)/barcode number is not available.

- The Waste Tracking Logbook is used to assist in tracking inventory.
- SWITS is used for the primary method of tracking the waste container inventory and container accumulation limits.

5.2.1 ASSIGN Package ID: CIN number/PIN.

5.2.1.1 IF a PIN is required for an ETF generated container, ASSIGN a number based on the following:

- Roll On/Roll Off (RO/RO)/drum – 200LEF – YEAR – next sequential number (e.g., 200LEF-17-XXX)
- Maverick – MAV – YEAR – next sequential number (e.g., MAV-17-XXX).

5.2.1.2 IF a PIN is required from a LERF generated container, ASSIGN a number as follows:

- 200LERF-YEAR-next sequential number (e.g., 200LERF-17-XXX).

5.2.2 COMPLETE the ETF Waste Tracking Logbook.

5.2.3 RECORD PIN/CIN number on Site Form (A-6007-331).
5.3 **Assemble PIN Record File**

NOTE – Waste being placed into containers are color coded by file folders which indicate the following:
- Red – Mixed Low Level Waste
- Yellow – Low Level Waste
- Blue – Hazardous Waste
- Green – Non-Regulated.

- Examples of waste type/descriptions are powder, debris, oil, or sump sludge.

5.3.1 **MARK** CIN/PIN and the waste type/description on the folder tab.

5.3.2 **PLACE** PIN file in dedicated waste records file cabinet

**OR**

**PROVIDE** to WMS.

5.3.3 **IF** appropriate and available, **PLACE** the following items in PIN file:
- Site Form (A-6007-331)
- Site Form (A-6007-332)
- Applicable SDS/MSDS, or reference to SDS/MSDS number
- Any special instructions or WPC memos that relate to the waste container
- Rad surveys.
5.4 Inspect Container Before Use

**Special Instructions**

An inspection must be performed on all containers before being issued for use.

5.4.1 **INSPECT** container(s) (internally and externally) AND **DOCUMENT** on the Site Form (A-6007-331).

5.4.2 **IF** a liner will be used, **INSPECT** plastic liner for defects.

5.4.3 **IF** container fails inspection, **PERFORM** the following:

5.4.3.1 **MARK** container as “DEFECTIVE”.

5.4.3.2 **NOTIFY** SOM and WMS of defective container.

5.4.3.3 **LINE OUT AND INITIAL** unused sections of the Site Form (A-6007-331) and return to WMS.

5.4.3.4 **OBTAIN** a different container.

5.4.3.5 **RETURN** to Section 5.2.

5.4.4 **COMPLETE** container inspection on Site Form (A-6007-331).

5.4.5 **PLACE** waste container at or near point of waste generation.

5.4.6 **OBTAIN** Site Form (A-6007-332).
5.4 Inspect Container Before Use (Cont.)

5.4.7 **RECORD** the following information in Site Form (A-6007-332):
- Barcode number or CIN number (if barcode is present on container or if applicable based on container type)
- PIN-ERDF number
- Container location
- Waste type
- Container type.

5.4.8 **PLACE** Site Form (A-6007-332) inside protective plastic bag on outside of container

**OR**

**PLACE** in designated container Waste Inventory Sheet binder.

5.4.8.1 **IF** waste is stored outside, **PLACE** inventory sheet inside of sealable plastic bag prior to placing into the protective plastic bag/envelope.

5.4.9 **IF** performing initial SWITS entry, **GO TO** Section 5.5,

5.4.10 **IF** packaging waste, **GO TO** appropriate section of this procedure per waste type to be packaged.
5.5 Initial Solid Waste Information Tracking System U101 Generator Data Entry

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

5.5.1 OPEN the SWITS 101 Screen.

5.5.2 ENTER the data directly or using the pull down menus into the data fields.

5.5.3 ENTER all the container data in the Generator Menu U101 screen, Basic Info tab, including:

- PIN number (CIN/barcode when available, otherwise facility assigned ID number)
- Secondary ID Number if applicable (ERDF container number)
- Indication of applicable regulations: Dangerous, Comprehensive Environmental Recovery Control and Liability Act (CERCLA), Toxic Substance Control Act (TSCA), and RAD.
- Waste description – i.e., LERF debris waste, process area debris waste, basin 43 powder, oil, etc.
- Location Facility (200LEF) and Current Location (i.e., Rm 134, LERF)
- Generator Group ID: 200LEF
- Source Company and Facility: WRPS, 200LEF
- Container Type/Size/UOM DM = drum, PC = plastic
- Container tare weight.

5.5.3.1 IF container tare weight was not prefilled, PERFORM the following to obtain tare weight:

a. REVIEW container for markings

   OR

   WEIGH the empty container

   OR

   CONTACT the transportation safety packaging design authority.

5.5.4 REVIEW AND COMPARE the U101 screen data against the original data.

5.5.5 SAVE after all the data has been entered and reviewed.
5.6 Container Set-Up

**Drums/DOT containers**

5.6.1 IF drum was brought in from outside of building where temperatures are less than 38 F or more than 80 F, SET drum inside for one to two hours to stabilize to ambient building temperature or as directed by SOM/FWS/WMS.

**Maverick/Soft-Sided containers**

5.6.2 OBTAIN soft-sided box (i.e., Maverick, waste wrangler, etc.).

5.6.3 PLACE soft-sided box in designated staging area.

5.6.4 OPEN soft-sided box per Attachment 6.

5.6.5 RETRIEVE box liner supplied by manufacturer from inside box.

5.6.6 OBTAIN pallet and obtain tare weight.

5.6.7 OPEN soft-sided box enclosure.

5.6.8 PLACE unfolded soft-sided box (with liner installed) on pallet.

5.6.9 PLACE plastic cover on soft-sided box.

5.6.10 REPOSITION pallet into soft-sided box enclosure.

5.6.11 CLOSE soft-sided box enclosure.

5.6.12 PLACE completed Site Form (A-6007-332) in sheet protector

OR

PLACE into Waste Inventory Sheet Binder.
5.6 Container Set-Up (Cont.)

Roll On/Roll Off containers

5.6.13 CHECK to confirm date on inspection sticker is not past due.

5.6.13.1 IF inspection sticker is past due, CONTACT SOM.

5.6.14 REQUEST HPT to perform surveys on container.

5.6.15 IF rain water is present on top of the cover, REMOVE rain water to the ground before removing the cover.

5.6.16 FOLD back container cover.

Special Instructions

Container checks include but are not limited to tarp, bungees, sides, tailgate, floor, closure assemblies, hooks, and rollers.

Operator should look closely for holes or tears in the RO/RO sides, floors, and cover.

NOTE - TO-100-320, Manage Roll-On Roll-Off Container requirements shall be followed if liquid is present inside RO/RO container.

5.6.17 VISUALLY CHECK for any conditions that may compromise RO/RO container’s ability to hold waste.

5.6.17.1 IF there is any damage to the container that may compromise the container’s ability to hold waste, CONTACT WMS/SOM.

5.6.17.2 FILL out Site Form (A-6007-147) AND ATTACH to RO/RO.

5.6.18 CHECK for any liquid accumulation in RO/RO container.

5.6.19 IF water is present, STOP AND CONTACT SOM/FWS/WMS.

5.6.20 PLACE absorbent socks and/or pads, against inside of tailgate, but outside of liner, to prevent free liquid from accumulating.

5.6.21 ENSURE pre-fabricated plastic liner is installed in RO/RO container, unless directed otherwise by SOM/FWS/WMS.
5.6 Container Set-Up (Cont.)

NOTE - Universal waste pads or SP400 waterworks may be used in addition to socks as determined by WMS.

5.6.22 PLACE absorbent socks inside liner to prevent free liquid from accumulating.

NOTE - Steps 5.6.23 and 5.6.24 may be performed in any logical order.

5.6.23 IF tailgate has not been opened, PERFORM the following:

5.6.23.1 ENSURE tailgate sidewinder latches are engaged with pin on gate.

   a. IF no pin is present, CONTACT SOM/FWS/WMS.

5.6.23.2 ENSURE secondary latch bail is engaged at bottom of gate.

5.6.24 IF tailgate has been opened, CONTACT WMS/SOM.

5.6.25 ENSURE container is in an RMA before applying Radioactive Waste/Material label.

5.6.26 SECURE lid/tarp on container.
5.7 Container Preparation

5.7.1 IF lock ring is used, REMOVE lock ring AND REMOVE lid from container.

5.7.2 PLACE liner in the container so that the opening extends over the top of the container and down sides.

5.7.3 IF stored outside, SECURE liner flaps with tape (2 inch wide or wider).

NOTE – Table 1 shows the minimum requirements for labeling/markings/stickers and specifies where they shall be placed on the most common container types.

- Placement of labels/markings/stickers on specialty container types shall be addressed by the WMS on a case-by-case basis.

- Figure 1 contains additional information for marking and labeling to ensure seams are visible.

CAUTION

Container seams need to be fully visible as part of container inspections.

5.7.4 ENSURE labels are not placed on container seams.

5.7.5 AFFIX CIN/PIN labels OR WRITE CIN/PIN number on container using weather proof permanent marker away from seams.

5.7.6 IF waste is radioactive, APPLY radioactive material labels.

5.7.7 APPLY labels specified by WMS, SOM/FWS and/or Site Form (A-6007-331) “Preparation” section.

5.7.7.1 IF hazardous or mixed waste, ENSURE EPA hazardous waste label is applied.

NOTE – Quantity of absorbent material should be twice the volume of liquid present or as specified by the WPC/WMS.

5.7.8 IF absorbent is required, ADD absorbent.

5.7.9 REPLACE lid.

5.7.10 IF lock ring was removed, REPLACE lock ring.
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<tr>
<td>5.7 Container Preparation (Cont.)</td>
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<tr>
<td>5.7.11</td>
<td>MOVE container(s) to storage/staging location as directed by SOM/FWS.</td>
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<tr>
<td>5.7.12</td>
<td>ATTACH a protective plastic envelop to the container <strong>AND</strong> INSERT Site Form (A-6007-332) into plastic envelope.</td>
</tr>
<tr>
<td>5.7.13</td>
<td>COMPLETE “Preparation/Packaging” section of Site Form (A-6007-331).</td>
</tr>
<tr>
<td>5.7.14</td>
<td>WHEN waste container setup is complete, PLACE Site Form (A-6007-331) in PIN record folder <strong>AND</strong> PLACE in designated locking file cabinet.</td>
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5.8 Package/Fill Radioactive Waste (LLW and MLLW) Container

NOTE – Waste descriptions on the Site Form (A-6007-332) are to be entered as precise as possible. For example, when oily/greasy rags are placed into a waste container, include the MSDS/SDS # for the oil, weight % by total volume of oil present on the rags, WPC # are entered.

- Waste to be packaged shall be pre-designated by WMS/WTS.
- Large/dense waste debris/items being removed from a Radiological Area that are going directly into a metal box or ERDF RO/RO, that are controlled as Radioactive Material, does not require bagging or wrapping (i.e., garage doors or drums).
- Attachment 2 provides examples of LLW and MLLW.

Special Instructions

All MLLW containers must remain closed when not actively in use.

The Maverick vinyl cover must be covering the top of the Maverick when waste is not being added. Cover must be secured by using a bungee cord or rope attached to the bottom corner loops of the Maverick.

Waste must not include items from the list in Attachment 1.

Site Form (A-6007-332) is completed concurrently with Waste Packaging activities.

5.8.1 IF adding waste to a RO/RO container, GO TO Section 5.11.

5.8.2 ENSURE all sharp objects are taped or secured to prevent puncture of the liner.

5.8.2.1 USE any of the following materials to secure sharp objects:

- Conweb pads
- Cardboard
- Fiberboard
- Cloth tape
- Plastic sheeting
- PVC tubing
- Paper.
5.8 Package/Fill Radioactive Waste (LLW and MLLW) Container (Cont.)

5.8.3 IF waste is wet, damp, or there is a chance of moisture, ADD absorbent AND ENSURE absorbent is placed in package where it will contact liquid.

5.8.4 IF waste is not already bagged, BAG OR WRAP waste using bag or sheeting with fabric-reinforced tape

5.8.4.1 IF bagging is used, SEAL bag with a J-Seal closure.

5.8.5 IF waste is to be stored temporarily outside of waste container, PERFORM the following:

5.8.5.1 IF waste is mixed or hazardous waste, MARK bag as “Hazardous Waste” using an EPA hazardous waste label AND RECORD the accumulation date.

5.8.5.2 REQUEST HPT to survey bag exterior for dose rate and contamination.

5.8.5.3 IF contamination is present, USE additional outer bag AND SEAL with J-Seal closure.

5.8.5.4 (HPT) RECORD survey results on radioactive label AND APPLY radioactive label to bag.

5.8.5.5 ENSURE that waste is stored in approved waste storage area at end of work shift.

5.8.6 PLACE wrapped package(s) in container.

5.8.7 ARRANGE packages to minimize empty spaces and voids.

5.8.8 DOCUMENT waste description, SDS #, weight % by volume, and work order on Site Form (A-607-332) for all items added to waste container.

5.8.9 IF mixed waste, MARK the accumulation date on the EPA Hazardous Waste Label with permanent marker AND RECORD the accumulation date on the Site Form (A-6007-332).

5.8.10 IF disposing of any controlled tools or equipment, RECORD property number on Site Form (A-6007-332).
5.8 Package/Fill Radioactive Waste (LLW and MLLW) Container (Cont.)

5.8.11 ENSURE no waste additions result in exceeding the container’s maximum gross weight.

5.8.12 IF additional waste will be added to package at a later time, SECURE/CLOSE container.

5.8.13 IF no additional waste items will be added to the container, COMPLETE any remaining entries in the “Preparation/Packaging” section of the Site Form (A-6007-331).

5.8.13.1 MARK all empty entries with a single line followed by initial and date.

NOTE – Waste drum is full when waste reaches top “rolling hoop” (upper raised ridge beneath drum lid) or the container is approximately 90% full.

5.8.14 IF container is full, or no additional waste will be added to container, GO TO Section 5.12 of this procedure.

5.8.15 TRANSFER waste container to appropriate storage area per SOM/FWS direction.
5.9 Prepare and package Non-Regulated Waste

NOTE - Waste generated outside of a radiological area is evaluated on a case-by-case basis to determine if the waste is radioactive. Waste generated inside of a radiological area is considered radioactive waste unless a radiological release is obtained on the waste in accordance with TFC-ESHQ-RP_RWP-C-0.

5.9.1 IF packaging waste into an ERDF Blue Dot non-regulated waste container, GO TO Section 5.11 for set up and loading waste.

5.9.2 ENSURE all waste disposed of as sanitary waste in facility dumpster meets the requirements listed in Attachment 3.

5.9.3 IF waste is an empty container, REFER to Section 5.15 of this procedure for additional instructions.

5.9.4 IF the non-regulated waste is a chemical, FOLLOW direction provided by WMS or waste planning checklist for packaging.

5.9.5 WRITE the name of the product and MSDS number on the outer bag with permanent marker.

5.9.6 DOCUMENT waste description, SDS #, weight % by volume and work order on Site Form (A-607-332).

5.9.7 WHEN container(s), other than facility specific dumpster, is ready for pickup, NOTIFY WMS.

5.9.8 IF a different container is used, REFER to the following Sections/Steps for closure:
   • Drums: Steps 5.12.1 - 5.12.3
   • RO/RO: Steps 5.12.4 - 5.12.15
   • Soft-sided Maverick: Section 5.13.

5.9.9 (SOM/WMS) COMPLETE Site Form (A-6003-116) AND ARRANGE for container pickup.
5.10 Prepare and Package Hazardous Waste

Special Instructions

All containers must remain closed when not in use.

Waste must not include items from the list in Attachment 1.

Site Form (A-6007-332) is completed concurrently with Waste Packaging activities.

NOTE - Hazardous waste generated at ETF is primarily stored in HS-011 SAA. Waste stored in a SAA is limited to 55 gallons of dangerous waste or one quart of acutely hazardous waste per waste stream.

5.10.1 IF waste stored in SAA has reached limit, MARK container with accumulation date AND

MOVE container within 72 hours to a 90-day AA.

5.10.2 (WMS) PROVIDE WPC to the SOM providing instructions for packaging and disposal of hazardous waste.

5.10.3 ENSURE appropriate hazard(s) are clearly labeled/marked on containers when waste is first placed in container.

5.10.4 IF any amount of hazardous waste is spilled, IMMEDIATELY NOTIFY SOM/BED.

5.10.5 BAG OR WRAP waste using clear bag or sheeting.

5.10.5.1 IF bagging, SEAL with a J-seal closure using fabric-reinforced tape.

5.10.5.2 IF wrapping, SEAL open seams using fabric-reinforced tape.

5.10.6 PLACE waste into HAZ container.
5.10 Prepare and Package Hazardous Waste (Cont.)

5.10.7 IF container is not stored in SAA, **MARK** accumulation start date on EPA Hazardous Waste Label.

5.10.7.1 **TRANSFER** waste container to appropriate storage area per SOM/FWS direction.

5.10.8 IF additional waste will be added to package at a later time, **SECURE/CLOSE** container.

5.10.8.1 **TRANSFER** waste container to appropriate storage area per SOM/FWS direction.

**NOTE** – Waste drum is full when waste reaches top “rolling hoop” (upper raised ridge beneath drum lid) or the container is approximately 90% full.

5.10.9 IF container is full, or no additional waste will be added to package, **RECORD** accumulation date on EPA Hazardous Waste label and Site Form (A-6007-332) for hazardous waste.

5.10.10 **GO TO** Section 5.12 of this procedure.
5.11 Package-Load Material in RO/RO Container

**Special Instructions**

Yellow plastic sheets or bags are not used for wrapping non-radiological packages.

To prevent free liquids inside the RO/RO container the use of absorbent pads, pigs and/or waterworks must be used.

When bagging of a waste item is not required, the item may still be bagged as a best management practice (i.e., step off pad waste going into RO/RO container).

5.11.1 REQUEST HPT to perform radiological surveys.

**Special Instructions**

Survey results should be less than background for direct readings, less than 20 dpm/100 cm² alpha or less than 1000 dpm/100 cm² beta-gamma removable contamination.

5.11.2 IF material surveyed is equal to or less than expected results, PERFORM the following:

5.11.2.1 REQUEST HPT to attach radioactive material labeling.

5.11.2.2 GO TO step 5.11.5.

5.11.3 IF material surveyed is greater than expected results, PERFORM the following:

5.11.3.1 REQUEST HPT to attach radioactive material labeling AND CONTACT SOM.
5.11 Package-Load Material in RO/RO Container (Cont.)

5.11.4 REQUEST HPT to provide radiological coverage during loading of radiological material in RO/RO containers.

5.11.5 IF rain water is present on cover, REMOVE rain water to the ground.

5.11.6 ROLL back cover.

NOTE - TO-100-320, Manage Roll-On Roll-Off Container requirements shall be followed if liquid is present inside RO/RO container.

5.11.7 IF liquid is present in RO/RO, STOP AND NOTIFY SOM.

5.11.8 PLACE waste into RO/RO container AND

ENSURE the following:

- Material will not wedge into bottom of container
- Material is at least six inches below sidewalls of container
- Waste items are recorded on Site Form (A-6007-332)
- Any individual piece of concrete, steel, pipe, miscellaneous metal, building debris, structural steel, or conduit shall not exceed four-feet in width, two-feet in depth, or seventeen-feet in length.
- The presence of objects over ten feet long in a container is noted as part of item description on Site Form (A-6007-332)
- Void requirement: Waste items that have void spaces must be either easily crushed or must be easily filled with soil or other material, using a dozer or other heavy equipment. Pipe greater than six inches requires void filling before disposal.

5.11.9 IF any of the conditions listed in step 5.11.8 cannot be met, CONTACT SOM.

5.11.10 IF packaging waste in < 90 day area (i.e., LERF vegetation), PLACE accumulation start date on waste container when waste is first placed into container.

5.11.11 IF loading is stopped, but is not complete, COVER RO/RO container with tarp AND

SECURE using tarp tie downs.
5.12 Container Closure and Shipment Preparation

Special Instruction

Additional markings may be required as directed by the Authorized Shipper instructions.

Once containers have been shipped, the Waste Tracking Logbook requires updating.

Drum Closure

5.12.1 IF closing a Skolnik drum, CLOSE per Attachment 4.

5.12.2 IF closing a Myers drum, CLOSE per Attachment 5.

5.12.3 COMPLETE Site Form (A-6007-332) and the “Closure” section of Site Form (A-6007-331) AND PLACE in PIN file.

Prepare RO/RO Container for Shipment

Special Instruction

This section may need to be repeated if a container is not immediately shipped or if free liquid is visible.

5.12.4 REQUEST HPT to perform contamination and dose rate surveys of RO/RO container.

5.12.5 IF rain water is present on cover, REMOVE rain water to the ground.

5.12.6 REMOVE RO/RO container cover.

5.12.7 CONFIRM no free liquids are present.

5.12.8 IF free liquids are present, ADD absorbent materials to remove liquid.

5.12.9 FOLD top of liner into RO/RO container.

5.12.10 ENSURE liner is overlapped in RO/RO container.

5.12.11 REINSTALL AND SECURE container cover.

5.12.12 COMPLETE Site Form (A-6007-332) and the “Closure” section of Site Form (A-6007-331) AND PLACE in PIN file.
5.12 Container Closure and Shipment Preparation (Cont.)

5.12.13 **ENSURE** container closed identifier is placed into the weatherproof RO/RO pouch.

5.12.14 **UPDATE** RO/RO container status tag.

5.12.15 **NOTIFY** WMS/SOM container is closed.

5.13 Closure of Soft-Sided Maverick Box

**NOTE** - For additional information on closure of the Soft-Sided Maverick Box see Attachment 6.

5.13.1 **GATHER** plastic soft-sided box liner over top of waste package AND **INSTALL** plastic tie.

5.13.2 **SEAL** tied end of soft-sided box liner with fabric-reinforced tape.

5.13.3 **TUCK** smaller flaps on opposite side into soft-sided box.

5.13.4 **UNFOLD** opposite (large and medium) flaps from soft-sided box interior to outside of container.

5.13.5 **FOLD** medium flaps over liner towards center of soft-sided box from each side.

5.13.6 **PLACE** affixed plastic ties through holes in flaps to join both flap ends.

5.13.7 **FOLD** larger flap over medium flaps from opposite end to other side.

5.13.8 **SECURE** larger flap with fabric ties attached on top of each corner end of box.

5.13.9 **REQUEST** HPT to survey waste box and work area for contamination.

5.13.10 **IF** contamination is found, **STOP AND** **NOTIFY** SOM.
5.13 Closure of Soft-Sided Maverick Box (Cont.)

5.13.11 (HPT) **IF** container is greater than 5mR/hr contact, **PERFORM** six-point survey **AND**

**RECORD** survey information on Radioactive Waste Label.

5.13.12 **WEIGH** closed soft-sided maverick box.

**NOTE** – If the total weight of the box and waste exceed the maximum gross weight allowed, the box will have to be repackaged.

5.13.13 **IF** maverick box is over maximum gross weight, **CONTACT** SOM.

5.13.14 **RECORD** gross weight (in kgs) on maverick and Site Form (A-6007-332).

5.13.15 **COMPLETE** Site Form (A-6007-332) and the “Closure” section of Site Form (A-6007-331) **AND**

**PLACE** in PIN file.

5.13.16 **TRANSFER** Maverick to appropriate storage area per WMS/SOM.
5.14 Repackage Waste

5.14.1 PERFORM work activity according to WTS/SOM instructions.

5.14.2 UPDATE Site Form (A-6007-332) to reflect repackaging changes.

5.14.3 NOTIFY WTS/SOM when repackaging activities are complete.

5.14.4 RETURN all completed paper to WTS/SOM.
5.15 Package and Disposal of Special Wastes

Unknown Wastes

NOTE - Generator knowledge and process knowledge will be used to identify waste.

5.15.1 IF unknown wastes are identified, PERFORM the following:

5.15.1.1 IMMEDIATELY NOTIFY SOM and WMS upon discovery of an unknown waste.

5.15.1.2 (SOM) INITIATE recovery actions to identify the unknown waste within 24 hours.

Empty Containers

NOTE - Empty containers that previously contained PCBs, F-listed materials, or acute waste must be managed as hazardous waste unless otherwise directed by the WMS.

5.15.2 IF any of the following are true, CONTACT SOM:

- Container remaining volume is greater than 1%
- Remaining contents, if any, are regulated
- Contents are acutely hazardous waste.

5.15.3 IF container does not have original manufacturer label, MARK container with permanent marker as follows:

- “Previously contained” product name (unless in original, labeled container)
- Product MSDS/SDS number.

5.15.4 MARK “EMPTY” on all sides of container.

5.15.5 DISPOSE of empty container as follows:

- Non-rad – Sanitary dumpster
- RAD – LLW container.
5.15 Package and Disposal of Special Wastes (Cont.)

Liquid Waste Drums

5.15.6 STORE liquid waste containers in the designated TSD Drum Storage area, OR

STORE liquid waste containers on secondary spill containment pallets with sufficient capacity to contain ten percent of the volume of all containers or the volume of the largest container, whichever is greater.

5.15.7 RECORD information for each liquid addition on Site Form (A-6007-332).

5.15.8 OPEN waste drum.

5.15.9 REINSTALL funnel if a permanent funnel is not present.

5.15.10 IF using carboy to transfer waste, PERFORM the following:

5.15.10.1 FILL carboy to level desired.

5.15.10.2 IMMEDIATELY TAKE carboy to the waste drum AND EMPTY contents into waste drum.

5.15.10.3 RECORD volume and MSDS/SDS # in Site Form (A-6007-332).

NOTE - Maximum volume capacity in waste drum is 90%.

5.15.11 FILL drum as directed by the WMS/SOM/WPC.
5.15 Package and Disposal of Special Wastes (Cont.)

5.15.12 WHEN drum is full, PERFORM the following:

5.15.12.1 TIGHTEN lid.

5.15.12.2 REQUEST HPT to survey waste drum and work area for contamination.

   a. IF contamination is found, CONTACT SOM for further direction.

5.15.12.3 (HPT) IF drum or container is greater than 5 mR/hr contact, PERFORM six-point survey AND APPLY survey information on radioactive waste label.

5.15.12.4 WEIGH drum.

5.15.12.5 TRANSFER drum to appropriate storage area per ETF-60K-001 or SOM/WMS direction.

5.15.13 COMPLETE Site Form (A-6007-332) and the “Closure” section of Site Form (A-6007-331) AND PLACE in PIN file.

PCB Wastes

5.15.14 IF PCB waste is identified, IMMEDIATELY CONTACT WMS/SOM.
5.16 Records

5.16.1 PERFORM the following for records identified within this procedure.

5.16.1.1 RECORD the number of times the record was generated in applicable column

OR

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

5.16.1.2 (WMS) VERIFY records are complete.

5.16.1.3 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>PIN File</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Site Form (A-6007-147)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Site Form (A-6007-331)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Site Form (A-6007-332)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

FWS/OE/Shift Manager SEND the completed records with Records Submittal Checklist attached to the Central Shift Office for records retention.

________________________________________ / __________________________ / ____________
Signature                                 Print (First & Last)          Date
FWS/OE/Shift Manager

The record custodian identified in the Company Level Record Inventory and Disposition Schedule (RIDS) is responsible for record retention in accordance with TFC-BSM-IRM_DC-C-02.
### Table 1 – Waste Container Labeling Guidelines

<table>
<thead>
<tr>
<th>Label</th>
<th>When Required</th>
<th>Location on Drum</th>
<th>Location on Box</th>
</tr>
</thead>
<tbody>
<tr>
<td>Barcode with CIN#</td>
<td>All containers</td>
<td>Bottom 1/3 of drum</td>
<td>Short side of box</td>
</tr>
<tr>
<td>Gross weight in kilograms</td>
<td>All containers</td>
<td>Same side as barcode</td>
<td>Same side as barcode</td>
</tr>
<tr>
<td>Applicable DOT labeling</td>
<td>All containers being shipped</td>
<td>As specified in 49 CFR</td>
<td>As specified in 49 CFR</td>
</tr>
<tr>
<td>Hazardous waste marking</td>
<td>HW/MW containers</td>
<td>Same side as barcode</td>
<td>Same side as barcode</td>
</tr>
<tr>
<td>Major Risk Labels(s)</td>
<td>HW/MW containers</td>
<td>Same side as barcode</td>
<td>Same side as barcode</td>
</tr>
<tr>
<td>PCB label (1)</td>
<td>When waste is regulated for PCB content under 40 CFR 761</td>
<td>Same side as barcode</td>
<td>Same side as barcode</td>
</tr>
<tr>
<td>Asbestos label</td>
<td>As required per 40 CFR 61, Subpart M</td>
<td>Same side as barcode</td>
<td>Same side as barcode</td>
</tr>
<tr>
<td>Caution Radioactive Material</td>
<td>When radioactive material is added (LLW)</td>
<td>Opposite side of barcode AND Same side as barcode</td>
<td>Opposite side of barcode AND Same side as barcode</td>
</tr>
</tbody>
</table>

(1) Label in accordance with 40 CFR 761.40. The label placed on containers holding PCB items must include that date the item was removed from service. For PCB articles and containers the label must include the date the waste was placed into storage, including 30-day temporary storage areas.
Figure 1 – Example of Drum Labeling
Attachment 1 – List of Prohibited Items

The following waste types are NOT acceptable in any form:

- Explosive waste
- Shock sensitive waste
- Pyrophoric waste
- Class IV oxidizer
- Waste that reasonably might be expected to become unstable, to be explosive, to generate excessive heat or toxic glass, or for any other reason cannot be stored safely
- Waste that might generate toxic gases, vapors, or fumes in concentrations that reasonably could be expected to exceed occupational exposure limits and/or air emissions standards during temporary storage
- Compressed gases packaged at pressure in excess of 1.5 atmospheres (152 kilopascals absolute pressure) at 20 C (68 F)
- Infectious waste.
Attachment 2 – LLW and MLLW Examples

The following types of waste are examples of Low Level Waste:

Waste material that cannot be radiologically released and has NOT come into contact with;
- Regulated chemicals
- Process liquid
- Thin film drier powder
- LERF wastewater
- Tanker truck wastewater

Waste that has been designated on waste planning checklist as LLW.

The following types of waste are examples of Mixed Low Level Waste:

Waste material that is radioactive AND has come into contact with;
- regulated chemicals
- process liquid
- thin film drier powder
- LERF wastewater
- tanker truck wastewater

Waste that has been designated on waste planning checklist as MLLW.
Attachment 3 – Non-Regulated Sanitary Waste Information

The following requirements are for all waste disposed of as sanitary waste in a facility dumpster or bulk container:

- Contains only: Non-regulated paper and cardboard, wood and miscellaneous debris, construction debris, metals, plastic, grounds maintenance waste, food waste, textiles, glass, rubber, leather, office and restroom waste
- No radioactive waste
- Not regulated by EPA/WDOE/TSCA
- No asbestos containing materials
- No free liquids
- No bio hazardous medical waste
- No rigid containers greater than 5 gallons (does not include bags) unless approved by a Special Waste Permit for that specific waste type or they are crushed/plastic containers cut in half.
- For containers, all DOT labels are removed, obliterated or securely covered and top/bottom are removed if the containers are mixed with other sanitary waste
- Meets WPC requirements
- Waste is releasable to the public and if required by facility RadCon manager, a verification survey has been performed.
- Containers are marked with the Non-Regulated Waste Label and the assigned Waste Profile as applicable provided by the WMS.
Attachment 4 – Skolnik Drum Closure Instructions

CLOSURE INSTRUCTIONS

In compliance with DOT 49 CFR §178.2 (c), persons shipping Skolnik drums must comply with the following closure instructions.

BOLT RING CLOSURE FOR OPEN HEAD DRUMS

1. CHECK GASKET – to ensure cover gasket is properly fitted into cover groove (see Fig. 1 or 2).
2. PLACE COVER ON DRUM – being careful to properly seat gasket around drum (see Fig. 3).
3. POSITION & SEAT RING – with lugs downward. Ensure the inner channel of the closure ring engages entire drum curl and cover (see Fig. 4). Apply downward pressure on cover. Use a non-sparking dead-blow mallet to further seat cover and drum curl into the inner channel of the ring.
4. INSERT BOLT – through the unthreaded lug of the ring. Assemble the lock nut onto the threaded end of the bolt and tighten into the threaded lug (see Fig. 5). Close the ring to an initial gap of about 1/4”.
5. TIGHTEN THE BOLT – with a calibrated torque wrench while using downward pressure on the cover and hammering the outside of the ring with a non-sparking dead-blow mallet to further seat the ring. Continue tightening and hammering the ring until the torque stabilizes at 50 – 60 ft-lbs and does not decrease when further hammering on the ring circumference is performed. Ring ends must not touch. (Effective 26 September, 2006 and in accordance with CFR 178.2(c), we have revised this procedure to use torque as the most effective closure requirement.)
6. LOCK RING – by tightening the nut against the unthreaded lug (see Fig. 6).

OPEN HEAD DRUM - LEVERLOCK CLOSURE

1. CHECK GASKET – to ensure cover gasket is properly fitted into cover groove (see Fig. 1 or 2).
2. PLACE COVER ON DRUM – being careful to properly seat gasket around drum (see Fig. 3).
3. OPEN LEVERLOCK – and place expanded ring on to the drum cover with the vertical skirt hugging the drum body (see Fig. 7).
4. CLOSE LEVERLOCK – by slowly and cautiously pulling the LEVERLOCK so that the outer ring engages the cover body (snug fit). Downward pressure along with tapping the outside of the ring may assist in an even closer (see Fig. 8).
5. ENGAGE LOCK – to complete closure.

DRUMS WITH FITTINGS

1. CHECK GASKETS – and ensure gasket is properly sealed on plug.
2. TIGHTEN – to specifications listed in the table, and do not cross thread.

<table>
<thead>
<tr>
<th>PLUG TYPE</th>
<th>Tri-Sure style</th>
<th>Risk style (Cap)</th>
<th>Risk style (Bolt)</th>
</tr>
</thead>
<tbody>
<tr>
<td>GASKET TYPES</td>
<td>Runz</td>
<td>Poly or Teflon</td>
<td>PE / PP (Composite Gasket)</td>
</tr>
<tr>
<td>1″ PLUG</td>
<td>12 lbs</td>
<td>20 lbs</td>
<td>10 lbs</td>
</tr>
<tr>
<td>2″ PLUG</td>
<td>20 lbs</td>
<td>30 lbs</td>
<td>40 lbs</td>
</tr>
</tbody>
</table>

IMPORTANT NOTES:

1. Closure Instructions Rev. D are valid to close all product tested with and/or manufactured under Closure Instructions Rev. C & Rev. B. Rev. D is identical and do not affect the actual closing of product.
2. A drum is properly closed only when all steps are completed in the manner and sequence indicated. If difficulties are encountered, do not ship the drum call Skolnik for further instruction.
3. Under the applicable DOT regulations, any changes made to the method of closure or closure components constitute a change in the design type of this packaging, and invalidates the certification.
4. After filling and prior to transport, the shipper should verify the torque of all closures to determine if the effects of heating and cooling or gasket relaxation have resulted in the need to re-tighten the closure.
5. Drums (other than the composites) are tested at room temperature.

www.skolnik.com
Attachment 5 – Myers Drum Closure Instructions

**Closure System Components**

To ensure compliance to the UN marking, the filler must inspect and re-tighten as necessary all applicable closures prior to shipping. Damaged gaskets must be replaced prior to shipment. Damage includes, but is not limited to tearing, twisting, and deterioration.

This procedure is for new steel drums manufactured by Myers Container and drums reconditioned /remanufactured by CMS, LLC only.

**DO NOT USE IF RING TOUCHES**

Torque is 60 ft-lbs

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**1a2 Openhead Drum Closure Procedure**

1. Inspect gasket for proper seating and remove any residue from curl prior to cover installation.
2. Place the ring on the drum, making sure the cover gasket is seated against the lip of the drum opening [the curl] and the gasket reseal on the cover. The gasket should not protrude beyond the cover or the drum curl.
3. Place the bolt ring onto the drum. Make sure that the bolt ring is centered so that the legs are positioned between the top surface of the drum. You will be required to pound on the cover with a rubber or other non-sparking mallet, or use a hammer to compact gasket. Make sure it is centered on the drum curl. Check to see that the cover and drum curl are punched together and within the reseal of the ring.
4. Thread jam nut onto bolt and then into threaded lag, and tighten bolt to 60 ft-lbs of torque. Hammer around the circumference of the ring while torque is applied to further seat the head onto the drum. Continue hammering on the ring circumference and torque the bolt until the torque is stabilized at 60 ft-lb, and does not loosen when further hammering on the ring circumference is performed. Tighten the jam nut against the unthreaded lag. The ring ends must not touch when 60 ft-lbs of torque is applied.

It is the filler responsibility to verify that the container has been properly closed prior to shipping filled drums.

**Bung Closing Procedures**

1. Inspect all bungs to ensure gaskets are in place and not twisted or damaged.
2. Insert all bungs and hand thread in a clockwise direction until hand tight. Do not cross thread.
3. Utilizing a "CALIBRATED TORQUE WRENCH" confirm and/or torque all bungs to required minimum specification.
4. Do not over tighten.
5. Wipe clean any spillage or debris.
6. If required, apply applicable cap seal.

As tested torque settings are listed. Acceptable tolerance +/- 3 ft-lbs.

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For more information, contact your Account Manager or, call (800) 406-9577

www.myerscontainer.com

12/9/2018
Rev. 2
T. Rees

Page 1 of 1
Attachment 6 – Soft-Sided Maverik Set-up and Closure Instructions

EDCNOVA
Instructions for Set-Up & Closure

Step 1) Unfold the container once, until two sides are 90 degrees to each other (see picture 1).

Step 2) Locate lift loop on inner fold (see picture 1).

Step 3) Place foot on NOVA bottom that’s resting on the ground, and with your hand; pull the lift loop shown in step 2, until the sides completely open (see picture 2).

Step 4) Pull the top cover out and around the outside of the container so the interior cavity is easily accessible.

Step 5) Turn NOVA on its side to reach the liner in the bag (picture 3). Open liner and place inside of NOVA and drape excess portion out and around the container’s outer walls for easy access to the opening.

Step 6) Fill the container with material.

Step 7) Once filled, twist the liner 3 times clockwise, and close with tie (enclosed), 8” from the top of the liner.

Step 8) Tie container-top closed, using the 3 side - ties through the loops, on the top cover, securely (see picture 4).

To reorder EDCNOVA:
Please call Questar at (330) 966-2070 or contact your sales representative.