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Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

14-AMRP-0166

APR 29 2014

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MAY 05 2014
EDMC

Ms. J. A. Hedges, Program Manager
Nuclear Waste Program
State of Washington
Department of Ecology
3100 Port of Benton
Richland, Washington 99354

Dear Ms. Hedges:

AGREED ORDER AND STIPULATED PENALTY NUMBER DE 10156, REQUEST FOR ADDITIONAL INFORMATION RELATED TO SECTION 4.6.4

References: (1) Ecology ltr. to M. S. McCormick, RL and J. C. Fulton, CHPRC, from J. A. Hedges, "Re: Agreed Order and Stipulated Penalty Number DE 10156, Documentation of Implementation of Actions Required by Section 4.6.4, Transmitted by U. S. Department of Energy Letter 14-AMRP-0107, dated February 20, 2014," 14-NWP-047, dtd. March 28, 2014.

(2) RL ltr. to J. A. Hedges, Ecology, from M. McCormick, and J. C. Fulton, CHPRC, "Agreed Order and Stipulated Penalty Number DE 10156, Documentation of Implementation of Actions Required by Section 4.6.4," 14-AMRP-0107, dtd. February, 20, 2014.

This letter transmits the additional information requested in the State of Washington Department of Ecology's letter dated March 28, 2014, Reference (1).

I certify under penalty of law that this document and all attachments were prepared under my direction and supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Please note that Section 4.4 of the Agreed Order limits the period of review for deliverables to fifteen days after submittal. The Section states "[w]ithin 15 calendar days Ecology will determine whether each action has been implemented as required by the schedule in section 4.6 of this Order." All parties are legally bound by the terms of the Agreed Order and there is no provision that allows for unilateral extensions of by one party. Further, a determination that a deliverable has not been implemented requires action on the part of Ecology. Notice within the allocated timeframe that a deliverable is deficient starts the period of time that the U.S. Department of Energy Richland Operations Office (RL) is allocated for payment of the

1223615, 1223210

portion of the penalty allocated to that deliverable. No notice was given to RL within the allocated period; therefore, RL considers the deliverable met.

If you have any questions, please contact us or Doug Shoop, RL Deputy Manager, on (509) 376-7395.

Matt McCormick, Manager
U.S. Department of Energy
Richland Operations Office

John C. Fulton, President and
Chief Executive Officer
CH2M HILL Plateau Remediation Company

Attachment

cc w/attach:
Administrative Record
Ecology NWP Library
Environmental Portal
HF Operating Record (J. K. Perry, MSA, H7-28)

cc w/o attach:
D. B. Bartus, EPA
L. T. Blackford, CHPRC
G. Bohnee, NPT
J. L. Boller, EPA
R. Buck, Wanapum
A. E. Cawrse, CHPRC
S. L. Dahl-Crumpler, Ecology
L. M. Dittmer, CHPRC
B. J. Dixon, CHPRC
D. A. Faulk, EPA
S. Harris, CTUIR
S. Hudson, HAB
M. N. Jaraysi, CHPRC
R. Jim, YN
R. A. Kaldor, MSA
K. Niles, ODOE
R. E. Piippo, MSA
J. B. Price, Ecology
A. L. Prignano, Ecology
A. J. Ramirez, CHPRC
D. Rowland, YN
J. R. Seaver, CHPRC
D. G. Singleton, Ecology
E. R. Skinnarland, Ecology

Agreed Order and Stipulated Penalty No. DE 10156

Request for Additional Information for Section 4.6.4, Ecology Letter 14-NWP-047 Dated March 28, 2014

Completion Package Contents:

1. Response to Washington State Department of Ecology Request for Additional Information for Agreed Order and Stipulated Penalty Number DE 10156, Section 4.6.4, Ecology Letter 14-NWP-047 Dated March 28, 2014
2. SW-040-043 (SWSD-PRO-OP-51714), Inspect CWC & Miscellaneous Buildings, Revision 9, Change 5, Dated 04/02/2014
3. SW-040-043 (SWSD-PRO-OP-51714), Appendix A - Weekly CWC RCRA/Non-RCRA Inspection Checklist for 2402WH, Dated 01/28/2014
4. SW-040-043 (SWSD-PRO-OP-51714), Appendix A - Weekly CWC RCRA/Non-RCRA Inspection Checklist for 2402WH, Dated 05/08/2013
5. RCRA Open Item List Report – CWC, Dated 04/21/2014
6. SWSD-PRO-OP-52802, Management of the List of SWOC Containers with a Higher Potential for Corrosion (Watch List), Revision 0, Change 0, Dated 03/06/2014
7. Working Schedule, SWOC Repair Schedule, Dated 04/13/2014
8. WMP-200-4.12 (PRC-PRO-NS-52318), SWOC Abnormal Container Management Program, Revision 20, Change 2, Dated 08/23/2013

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Response to Washington State Department of Ecology Request for Additional Information for Agreed Order and Stipulated Penalty Number DE 10156, Section 4.6.4, Ecology Letter 14-NWP-047 Dated March 28, 2014

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RESPONSE TO WASHINGTON STATE DEPARTMENT OF ECOLOGY REQUEST FOR ADDITIONAL INFORMATION FOR AGREED ORDER AND STIPULATED PENALTY NUMBER DE 10156, SECTION 4.6.4, ECOLOGY LETTER 14-NWP-047 DATED MARCH 28, 2014

Item number from Ecology Letter	Ecology Request	DOE/CHPRC Response	Documents Supplied
1, Item 1	**USDOE's Dangerous Waste Inspection Log Entries** Submit to Ecology an explanation of, or identify in the facility inspection procedure, the process used when a dangerous waste inspection of multiple buildings or outdoor storage units is documented on one inspection log sheet and a problem is noted. *How is the location the problem occurred and the remedy specified in the log?*	Technical Procedure SW-040-043, Inspect CWC & Miscellaneous Buildings, provides direction to the Solid Waste Operations Complex operations personnel to either write a clear description of an identified condition in the comments section of the appendix being performed, including location information of the noted item, or enter the corrective action taken to correct the problem in comments section of the applicable appendix. For inspection sheets that are for multiple locations, the inspector will note in the comments section location information or other identifying information (i.e. package number, specific building number). Identified conditions will be added to the "RCRA or Non-RCRA Open-Item List" and tracked until remedied. The open-item lists are reviewed weekly and tracked by supervision/management until resolution of the identified problem. When an identified condition action is completed, the" Closed Open-Item List" is updated with a remedy status and closure date. The 02, 03 and 04 series buildings have individual inspection sheets the Flammable and Alkali Metal Waste Storage Modules and outside storage areas are grouped together. Any conditions will be	SW-040-043 (SWSD-PRO-OP-51514) "Inspect CWC & Miscellaneous Buildings," Revision 9, Change 5, dated 04/02/14

RESPONSE TO WASHINGTON STATE DEPARTMENT OF ECOLOGY REQUEST FOR ADDITIONAL INFORMATION FOR AGREED ORDER AND STIPULATED PENALTY NUMBER DE 10156, SECTION 4.6.4, ECOLOGY LETTER 14-NWP-047 DATED MARCH 28, 2014

		noted in the comments section of the inspection sheet identified by location in accordance with procedure SW-040-043, section 4.3.5.	
1, Item 2	**USDOE's Dangerous Waste Inspection Log Entries** Submit to Ecology a revision or explanation of Step 4.1.2 of procedure SW-040-043, Revision 9, Change 3, Inspect CWC & Miscellaneous Buildings. Step 4.1.2 incorrectly states, "If open item already exists, and no additional deficiency is recorded, THEN CHECK "Yes" box because it is an existing open item.' This is incorrect. At each inspection of a dangerous waste management unit, all inspection logs noted deficiencies that need to be addressed on a schedule, which prevents hazards to health and the environment. Marking a yes that the item is okay, and subsequently having an open item is inconsistent. (WAC-173-303-320(3) and WAC 173-303-630(6))	4.1.2 IF open item already exists, and no additional deficiency is recorded, THEN CHECK "Yes" box because it is an existing open item. Step 4.1.2 is written correctly for an existing deficiency that has been previously identified and is tracked using the RCRA or Non-RCRA Open-Item List. The inspector enters the associated log number in the comments section of the appendix sheet for the building that is being inspected as stated in Step 4.1.3. The log number will demonstrate the tracking of a deficiency for a specific building or location. If a new deficiency is identified, then the operations personnel that is performing the inspection will check the" No" column and makes a note in the comments section. **Example** - The Weekly RCRA inspection performed on 1/28/14 for 2402-WH lists open items 13-004 and 13-007. This example will follow 13-004. The CWC RCRA Open Item List Report documents open item 13-004 as discovery of cracks and scratches in the flooring on 5/6, 7, 8, and 9/13. The Weekly RCRA inspection for	The Weekly RCRA inspection performed on 1/28/14 for 2402-WH The Weekly RCRA inspection for 2402-WH performed on 5/8/13 The CWC RCRA Open Item List Reporting showing 13-004 dated 4/21/2014.

RESPONSE TO WASHINGTON STATE DEPARTMENT OF ECOLOGY REQUEST FOR ADDITIONAL INFORMATION FOR AGREED ORDER AND STIPULATED PENALTY NUMBER DE 10156, SECTION 4.6.4, ECOLOGY LETTER 14-NWP-047 DATED MARCH 28, 2014

		2402-WH performed on 5/8/13 documents the initial discovery of scratches on the floor. Question #1 on the inspection checklist is checked "NO" and red circled. This is when open item 13-004 originated. Inspections (specifically question #1) performed for 2402-WH post 5/8/13 were checked "YES" and open item 13-004 was entered in the comments section. The same process was applied to open item 13-007 as well, which was originally identified on 10/16/13. 13-004 will be closed out when the floor repair campaign is completed later this fiscal year. *Deficiency and condition are used interchangeably in the procedure. *Log number is assigned via the open and closed items lists for both RCRA and non-RCRA.	
1, Item 3	**USDOE's Dangerous Waste Inspection Log Entries** Submit to Ecology documentation verifying the training of appropriate SWOC personnel on Step 4.1.4 of the CWC inspection procedure: SW-040-043, Rev 9, Change 3 Inspection CWC & Miscellaneous Buildings. Step 4.1.4 provides guidance for the operator to document remedies taken "on the inspection sheet." However, it does not appear that Step 4.1.4 for documenting correction of problem is reflected on the inspections sheet.	**Training** - CWC NCO's performing CWC RCRA inspections are qualified with the successful completion of the following three actions: 1. Complete CWC Surveillance Certification Qualification Card, Course # 300221. Tasks performed within this qual card include a task to perform the Weekly RCRA Inspection in accordance with procedure SW-040-043 with a qualified individual. Task criteria includes: Obtain Appendix A; Obtain and Review Open Item List; Complete	SWSD-PRO-OP-52802 "Management of the List of SWOC Containers with a Higher Potential for Corrosion (Watch List)," Revision 0, Change 0, dated 03/06/2014 WMP-200-4.12 (PRC-PRO-NS-52318) "SWOC Abnormal Container Management Program," Revision 20, Change 2, dated 08/23/2013

RESPONSE TO WASHINGTON STATE DEPARTMENT OF ECOLOGY REQUEST FOR ADDITIONAL INFORMATION FOR AGREED ORDER AND STIPULATED PENALTY NUMBER DE 10156, SECTION 4.6.4, ECOLOGY LETTER 14-NWP-047 DATED MARCH 28, 2014

	Items noted in the comments on an inspection log sheet for one week appeared to have been dropped from the next week's inspection log for that unit. For example, the January 22, 2014, inspection sheet for 2403WA identifies rusting and sweating drums. The January 28, 2014, inspection sheet for 2403WA does not list any of the drums noted in the January 22, 2014 inspections sheet. No entries are provided in the January 28, 2014, comment section of the inspection sheet indicating they have been closed since the previous inspection.	Appendix A; Complete Comments Section of Checklist; and Discuss Handling/Processing of New/Closed Open Items. 2. Complete CWC Surveillance Certification Student Manual and Exam, Course # 300220. Section 3.1, Open Items, provides the student with direction and guidance on how open and closed items are managed and closed out. The guidance provided in the manual is consistent with Step 4.1.4 in procedure SW-040-043 with regards to closing out an open item that has been resolved. 3. Complete CWC Surveillance Certification Performance Demonstration, Course # 300221. The student performs a selection of tasks from procedure SW-040-043 while being observed by a CWC Supervisor. **Example** - The containers from the stated example are being tracked per Administrative Procedure SWSD-PRO-OP-52802 "Management of the List of SWOC Containers with a Higher Potential for Corrosion (Watch List)". The Watch List is more detailed than the open items list. When containers are identified with questionable conditions, the inspector will	

RESPONSE TO WASHINGTON STATE DEPARTMENT OF ECOLOGY REQUEST FOR ADDITIONAL INFORMATION FOR AGREED ORDER AND STIPULATED PENALTY NUMBER DE 10156, SECTION 4.6.4, ECOLOGY LETTER 14-NWP-047 DATED MARCH 28, 2014

		notify the Shift Duty Officer (SDO) and await further direction. Based on the field observations and actions taken by the SDO, Radiological Control, and Industrial Hygiene, a couple of options are available to the SDO: 1), the SDO may request the Abnormal Container Management Program (ACMP) evaluator to evaluate the container condition and determine if entry into the ACMP is warranted and 2), the SDO will notify his management and the designated Transuranic Waste Subject Matter Expert to discuss whether or not the container qualifies to be added to the Watch List in accordance with Administrative Procedure SWSD-PRO-OP-52802. Operations personnel use the Watch List to track identified containers while performing inspections and surveillances. A container may be entered into both the ACMP (WMP-200-4.12) and the Watch List for disposition. Containers identified, tracked, and managed in the ACMP and/or the Watch List are not added to the Open-Item List.	
2	**USDOE's inspection records for SWOC facilities (CWC, WRAP, and T-Plant), concerning the Resource Conservation and Recovery Act Open Item List Report for CWC** Items identified on the Open Item List are shown without any remedial actions taken.	**Closure of Units:** The SWOC DWMUs planned to undergo closure have already been addressed through submittal of a Class 3 Permit Modification Request in accordance with the Corrective Action Facility Order (CAFO) requirements. The Class 3 Permit Modification Request included a Closure Plan for each closing	Schedule of repair activities by facility SWSD-PRO-OP-52802 "Management of the List of SWOC Containers with a Higher Potential for Corrosion (Watch List)," Revision 0, Change 0, dated 03/06/2014 WMP-200-4.12 (PRC-PRO-NS-52318)

RESPONSE TO WASHINGTON STATE DEPARTMENT OF ECOLOGY REQUEST FOR ADDITIONAL INFORMATION FOR AGREED ORDER AND STIPULATED PENALTY NUMBER DE 10156, SECTION 4.6.4, ECOLOGY LETTER 14-NWP-047 DATED MARCH 28, 2014

	Consult with Ecology and then if determined by Ecology, submit a schedule for resolution of the following open items or items that should be on the open items list: • Closure of unused and/or unfit-for-use units. • Structure repairs, including roof and wall repair, and repair to secondary containment • Container integrity issues	unit, which addresses closure activities as well as the accompanying schedule. **Repairs**: Activities are scheduled as identified. (see schedule). (*Repairs are based upon yearly campaign) **Container Integrity Issues:** Container integrity issues are identified and prioritized via SWSD-PRO-OP-52802, Management of the List of SWOC Containers with a Higher Potential for Corrosion (Watch List), and the ACMP.	"SWOC Abnormal Container Management Program," Revision 20, Change 2, dated 08/23/2013
3	**US DOE's inspection records for SWOC facilities (CWC, WRAP, and T-Plant), concerning WAC 173-303-320 General Inspections and WAC 173-303-630 Use and Management of Containers** Contact Ecology to schedule a Compliance Assisted Visit between Ecology and SWOC facility operators to observe and supply feedback on performing dangerous waste inspections. Ecology has a concern with the completeness and thoroughness for dangerous waste inspections.	There is no regulatory definition of a "compliance assisted visit." Ecology has the regulatory authority to perform inspections. Ecology has already performed such inspections on March 5, 2014 (CWC Outdoor Storage Area A) and March 25, 2014 (CWC 2402 Series buildings) and participated in the April 1, 2014 U. S. Environmental Protection Agency inspection of CWC (Flammable and Alkali Metal Waste Storage Modules, the Outdoor Storage Areas, and the 2402 and 2403 Series Buildings).	NA

SW-040-043 (SWSD-PRO-OP-51714), Inspect CWC & Miscellaneous Buildings, Revision 9, Change 5, Dated 04/02/2014

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One Team. One Culture.

Technical Procedure

SW-040-043

SWSD-PRO-OP-51714

Inspect CWC & Miscellaneous Buildings

Revision 9, Change 5

Published: 04/02/2014
Effective: 04/02/2014

Project: DWF&RS-Decommissioning Waste Fuels & Remediation Services
Topic: Operations

Technical Authority: Rosser, James
Functional Manager: Gilles, David

Use Type: Reference

JHA: Administrative
Periodic Review Due Date: 04/19/2016
Rev. 9, Chg. 5
USQ Screen Number:

- Solid Waste Operations Complex : **Screening Determination Performed:** SW-14-014
  Screener: Rosser, James

CHANGE SUMMARY

Description of Change

Corrected facility mode in Appendix E. Mistakenly said Operation but should be Standby.

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1.0 INTRODUCTION

1.1 Purpose

This procedure provides instructions for inspecting the following facilities and their associated equipment. This surveillance is necessary for prompt identification and correction of safety hazards, maintenance, and general housekeeping problems:

- Central Waste Complex (CWC)
- South Alkali Metal Storage Modules (SAMSM)
- 2727W Sodium Storage Building
- 90-day Accumulation Areas
- Satellite Accumulation Areas
- 2420-W Storage Pad

1.2 Scope

Regular inspection of waste/material storage facilities identify malfunctions and deterioration, , or packaging problems that may cause or lead to release of radioactive or hazardous waste constituents to the environment or pose a threat to human health.

1.3 Applicability

This procedure is designed to satisfy safety concerns and to implement the following federal and state environmental regulation inspection requirements:

- 40 CFR 265, *Interim Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities*
- 40 CFR 761, *Polychlorinated Biphenyls (PCBs) Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions*
- WAC 173-303, *Dangerous Waste Regulations*

1.4 Implementation

This procedure is effective upon publication.

2.0 PRECAUTIONS & LIMITATIONS

2.1 Warnings & Cautions

2.1.1 When performing inspections alone, communication (radio, telephone, etc.) must be available for emergencies/safety.

2.1.2 Based on conditions, management may require a second operator to be present during inspections for safety reasons.

2.1.3 If an emergency should occur or abnormal condition(s) exist, CWC/Low-level Burial Grounds (LLBG) management/field work supervisor (FWS) must be notified immediately by radio or phone.

2.1.4 If containers show signs of leaks or other abnormal condition(s) exist, CWC/LLBG management/FWS must be notified immediately after exiting to a safe location (radio, phone, etc.).

2.1.5 Permits are required for outdoor burning; designated cutting and welding operations, possessing specified inventories of chemical, flammable gases, explosives, and flammable and combustible liquids.
[TSR 5.7.1.ignition control]:

- No smoking or open flames are permitted in designated non-smoking areas.
- Do not transmit from portable radios or cell phones in flammable storage modules.
- Use of tools that may be ignition sources like power tools, welding equipment, and heat generating devices must be approved by management.
- No empty wooden pallets shall be stored inside any CWC waste storage buildings.

2.1.6 For 2404-WA Drum Storage Area lighting only, lamps are to be turned off at least once a week for 15 minutes to decrease the possibility of an inner arc-tube rupture. Management will implement this precaution by having the lamps turned off at the end of each workday, while performing Appendix N.

2.2 Limitations

2.2.1 Monthly surveillance required to ensure sufficient water supply and pressure is available from the 200 West Area Sanitary Water System for proper operation of the fire sprinkler system. **[SR 4.2.1.1]**

2.2.2 Monthly surveillance required to verify all control valves within the facility boundary in the open position. **[SR 4.2.1.2]**

2.2.3 Vehicles/containers with a total of more than 40 gallons of propane in a single location (i.e., a single CWC building, outside facility zones) shall not be allowed within the buildings or within 25 ft of outside arrays of stored or staged TRU waste containers.
[TSR 5.6.3.g][FHA SWOC Key 1.3.1.8]

2.2.4 Transient combustible materials. **[TSR 5.7.1.b&c]**

a. Transient combustible materials shall not exceed the amounts and types required for current operations. Transient combustible materials include but are not limited to wood, paper, liquid, cloth, or plastic debris left in the form of shipping containers, wrapping material, dunnage, wooden pallets, supplies, or operational waste that is remaining from operational activities.

Exception: Transient combustible materials are not intended to encompass windblown vegetation.

b. Accumulations of any transient combustible waste material and debris outside shall be separated from waste containers or arrays by a distance of at least 33 ft at the end of each work day.

2.2.5 A minimum spacing of 12 ft (3.7 m) shall be maintained between waste array zones of non-combustible waste containers in CWC buildings and this space shall be maintained free of stored combustibles. **[TSR 5.6.4.g]**

2.2.6 A minimum of 33 ft shall be maintained between outside facility zones and areas between zones maintained free of combustible materials. Operational evolutions may temporarily introduce transient combustible materials into this separation distance while actively engaged in waste handling activities, but will be removed upon completion of the activity. **[TSR 5.6.4.h]**

2.2.7 Requirements for handling and storage of SWDBs at the CWC SHALL be followed to ensure box integrity as outlined in Appendix 3C of the MDSA (HNF-14741). **[TSR 5.6.4.i]**

2.2.8 Waste shall be stored in CWC buildings only in noncombustible containers. **[FHA CWC Key 1.3.2.1, 2, 10, & 11]**

Exception: A maximum of 10 wooden boxes or their equivalent may be stored in each of the 2404-W series buildings. Only retrieved wooden boxes that are no longer weather tight may be stored in the 2404-W buildings. A segregation distance of 25 feet shall be maintained between any wooden boxes and any adjacent metal waste container arrays. Prior to storage of wood boxes inside CWC buildings, a review by a Fire Protection engineer shall be completed and documented.

2.2.9 Prior to moving a waste container, the accessible surfaces of the container shall be examined, per criteria in Appendix Q. Waste containers that meet the entry criteria shall be entered into the ACMP. **[TSR 5.6.4.b]**

2.2.10 TRU bulged containers shall be vented within 5 calendar days once they are accessible for movement. Unvented drums (TRU and LLW) identified as being bulged shall be placed in vented overpacks and vented in accordance with SAC 5.6.1 at a SWOC facility. Unvented bulged drums (TRU and LLW) which are unable to be overpacked, shall be entered into the ACMP and required resolution determined through the action plan. The action plan steps for drums, up to and including container venting, shall be completed within 5 calendar days for bulged drums that cannot be overpacked once they are accessible for movement. **[TSR 5.6.4.d]**

2.2.11 For TSR-driven surveillances in this procedure, dates/times that LCO surveillances are performed shall be documented. Failure to complete the surveillance within the specified frequency, as qualified in table notes, shall constitute an LCO violation. **[TSR 1.3]**

2.2.12 Radioactive waste in drums or containers shall not be stored/staged in stacks more than 2 tiers high outside. For outside arrays, aisles are not required if

the arrays are only one tier high. Inside stacks may be up to 3 containers high provided the third tier drums shall be banded horizontally using metal banding. Waste boxes do not need to be banded on the third tier. Single drums on the third tier are not allowed unless the drum and pallet are banded together with vertical bands in a cross pattern. Upon discovery of a broken or missing drum band the missing band shall be installed within 24 hours. Drums stored in excess of 1 tier high are stored on pallets.
[TSR 5.6.4.a][FHA SWOC Key 1.3.1.10, 11, & 12]

Note: Per Hanford Fire Permit requirements, drums stacked 3 high on wood pallets are allowed to be stacked up to 10 ft 4 inches high in 2402 series buildings.

2.2.13 Vehicle/Heavy Equipment Controls for Exposed Waste. **[TSR 5.6.3.a] [FHA LLBG Key 1.3.3.4 & 5].**

Engineering shall be contacted to ensure controls are in place for vehicles and heavy equipment with greater than 400 gallons of fuel or other combustible/flammable liquids and needing to access areas containing waste, when such equipment is within 100 ft of waste containers, to preclude the introduction of flammable liquids within 5 ft (1.5 m) of noncombustible waste containers or caissons and within 53 ft (16 m) of combustible waste containers. Vehicles will travel at low speeds.

Note: The fuel volume limits do not apply to Class IIIB (Flash Point greater than 200°F) lube oils and hydraulic oils that are required for vehicle operation.

2.2.14 The maximum quantity of fuel or other combustible/flammable liquids for any vehicle (including forklifts) allowed inside a CWC building is 125 gallons. Specific management approval will be obtained and spotter(s) will be present while a vehicle with greater than 26 gallons of fuel or other combustible liquids is present in the building and the total quantity of fuel within the building must remain below 125 gallons. The fuel restriction does not apply to Class IIIB (Flash Point greater than 200°F) lube oils and hydraulic oils that are required for vehicle operation. **[TSR 5.6.3.d][FHA CWC Key 1.3.2.4 & 1.3.2.9]**

2.2.15 Aisle widths are controlled to nominally 36 inches wide for emergency egress, CPS requirements, and material movements. The 36 inch wide requirement is conservative and used to cover all spacing requirements at SWP.
[FHA SWOC Key 1.3.1.13]

2.2.16 Plastic pallets, plastic slip-sheets, plastic overpacks, plastic overpack drums, plastic spill retention pallets and plastic drum retainers are prohibited for use in CWC waste storage buildings. **[FHA CWC Key 1.3.2.7]**

2.2.17 Drums coated with polyurea will be stored on noncombustible metal pallets or directly on the floor/ground. **[FHA SWOC Key 1.3.1.9]**

2.2.18 NFPA Containers can only be maintained in the 2404 series buildings or Low Flashpoint Modules (maximum of 8 NFPA Containers in each Low Flashpoint Module) unless all of the following requirements are met for storage in 2402 or 2403 series buildings: **[FHA SWOC Key 1.3.1.4 & 5]**

a. Maximum of 16 NFPA Containers.

b. Maximum of 15 gal of liquid waste per NFPA Container.

c. Pallets containing NFPA Containers may be stacked up to three tiers high with no more than four NFPA Containers per stack (column) of pallets.

d. At least 8 ft (2 pallet stacks) of separation free from all exposed combustible materials other than pallets and dunnage and waste in sealed, non-combustible containers between any stacks containing NFPA Containers in any row of drums. The 8-ft separation distance shall not apply across an aisle.

e. NFPA Containers shall not be located directly across the aisle from another NFPA Container(s).

2.2.19 A separation distance based on box height will be maintained between exterior wood or FRP box storage and any CWC structure (see Table 18.1.1-1). **[FHA SWOC Key 1.3.1.14]**

2.2.20 "Birdcage" containers on wood pallets will be stored in groups of no more than 15 units. The groups will be separated by a standard width inspection aisle between rows and a 48 inch gap free from all other combustibles within the row. **[FHA CWC Key 1.3.2.12]**

3.0 PREREQUISITES

3.1 Tools, Equipment, & Materials

3.1.1 Essential Equipment:

- Inspection Checklists
- Open-Item Lists
- Pens including red
- Portable radio or cell phone
- Keys necessary for entrance into locked areas.

3.1.2 As Needed:

- Government vehicle
- Photographic equipment (for recording discrepancies)
- Spill response tools and equipment
- Facility logbook
- Protective clothing/equipment as required by RWP(s) or AJHA
- Flashlight

3.2 Special Personnel Requirements

- Radiological Control Technician (RCT), as required

3.3 Performance Documents

- Operator Aid, CWC/LLBG-OPA-001, *90-Day/SAA Inventory*.

3.4 Pre-Start Items

3.4.1 Management/FWS has requested inspections be performed.

3.4.2 Personnel must be ACED in under current radiological work permit (RWP).

3.4.3 Vehicles and communication devices are in working order.

3.4.4 New inspection Checklists have been obtained from Procedure web page.

3.4.5 Precautions and limitations for entry into facility are satisfied.

3.4.6 Personnel have reviewed the radiological conditions according to the radiological status map before entering building.

NOTE:
- *Sections of this procedure may be performed independently, concurrently, repeated, or not performed when unneeded.*
- *Abnormal conditions must be circled in red on Checklists.*
- *[TSR] after step, in note, or in appendix relates to Safety Basis information in HNF-15280.*
- [FHA] after step contains actions necessary to comply with the Fire Hazards Analysis (FHA), HNF-21239.
- All RCRA "No" or "N/A" data points are required to have an explanation in the Comments section of the inspection sheet. An explanation for non-RCRA "No" or "N/A" data points is not required.

4.0 PERFORMANCE

4.1 Perform Open-Item List Check

4.1.1 While performing any inspection in this procedure, PERFORM Open-Item List check.

NOTE: *A new open item exists when "No" column is checked for an inspection item.*

4.1.2 IF open item already exists, and no additional deficiency is recorded, THEN CHECK "Yes" box because it is an existing open item.

4.1.3 IF facility/module has any RCRA open items on Open-Items List, THEN ENTER "RCRA open item log #_" in Comments section of inspection sheet.

4.1.4 IF any open items (RCRA or Non-RCRA) have been closed since previous inspection, THEN ENTER the following in Comments section of inspection sheet:

- Date item was closed
- How item was closed.
- Log number of open item.

4.2 Monthly Inspection of Automated External Defibrillator (AED) Units

4.2.1 OBTAIN Monthly Non-RCRA AED Inspection Checklist (Appendix M).

4.2.2 PERFORM Open-Item List check per Section 4.1.

4.2.3 CHECK the following for each AED listed on Appendix M, AND RECORD results on Appendix M.

a. OPEN AED lid and wait for AED to indicate status.

1) OBSERVE that status indicator changes to red AND after 5 seconds, CONFIRM that status indicator returns to green.

b. CONFIRM voice prompts.

c. CLOSE AED lid AND CONFIRM status indicator remains green.

d. CHECK expiration date of the following:

- Battery
- Installed electrodes.
- AED pads.

e. CONFIRM supply inventory of each AED including the attached kit.

1) IF missing items or items will expire in less than 2 months, THEN RECORD missing/expiring item in Comments section of Appendix M, AND NOTIFY Facility Management or FWS.

Supply Inventory
Two sets of AED pads (1 set is a spare)
Two pocket mask (face shield) with one-way valve
Two pair of Nitrile or Latex gloves
Scissors (blunt tip)
Two razors
Five sterile (4X4) gauze pads

4.2.4 RECORD name (print/sign), date, and time in Operator blank at bottom of completed Appendix M.

4.2.5 SUBMIT completed Appendix M to FWS for review, signature, notifications, and disposition.

4.3 Weekly Inspections

NOTE: *A weekly RCRA and a Non-RCRA inspection are done simultaneously on any building/area. The weekly RCRA and Non-RCRA inspections are recorded on Appendix A.*

4.3.1 Whenever a RCRA inspection cannot be performed within the required frequency,
PROVIDE condition information for why inspection could not be performed in Comment section of appropriate Checklist,
AND NOTIFY ECO (immediately).

4.3.2 OBTAIN current Weekly CWC RCRA/Non-RCRA Inspection Checklists (Appendix A), for each of the following areas:

- 2401-W, 2402-W, 2402-WB through 2402-WL
- 2403-WA through 2403-WD
- 2404-WA
- 2420-W Storage Pad
- Waste Receiving & Staging Area (WRSA) (CWC SA1)
- Mixed Waste Storage Pad (MWSP) (CWC SA2)
- Low Flashpoint Storage Modules (LFSM)
- Alkali Metal Waste Storage Modules (AMW)
- Outside Storage Areas

4.3.3 PERFORM Open-Item List check per Section 4.1.

4.3.4 COMPLETE inspection by entering a check mark in appropriate column of Appendix A.

NOTE: *All RCRA "No" or "N/A" data points are required to have an explanation in the Comments section of the inspection sheet. An explanation for non-RCRA "No" or "N/A" data points is not required.*

a. IF question on Appendix A does not apply,
THEN CHECK "N/A".

b. IF no containers are present,
THEN INDICATE no containers are present in Comments section of Appendix A.

c. EXPLAIN all "No" and "N/A" checked boxes for items 1 through 13 clearly in Comments section of Appendix A.

d. IF inspections are not completed by end of shift,
THEN PLACE the inspection sheet in a fire-proof file cabinet at MO-288 or MO-720 until completed.

NOTE:
- *Floors of buildings that store ignitable, reactive, dioxin, or free liquid waste, must be able to contain leaks, spills, or rainfall.*
- *Small cracks and scratches may not indicate RCRA deficiency or abnormal condition if impervious coating can still maintain containment. However, penetrations/cracks through coating/sealant into concrete must be recorded on Appendix A and marked on floor so repairs can be scheduled.*
- *Because CWC facilities/modules are not weather tight, condensate buildup and small pools of water may occur. These conditions are temporary and are not an abnormal condition as long as the source can be readily identified.*

e. Appendix A question 1

1) IF unsure of containment condition,
THEN NOTIFY FWS for a determination.

2) CIRCLE deficiency on floor with permanent marker so it can be seen to be repaired.

f. Appendix A question 2

1) IF small pools of water have formed,
THEN CLEAN UP water as directed by FWS.

g. Appendix A question 6

1) IF problem is found,(i.e. free liquids are found or spill pallet is not in good condition)
THEN PERFORM the following:

- SWIM as appropriate
- NOTIFY FWS.
- MARK No column on Appendix A.
- RECORD problem in Comments section of Appendix A.
- STAND BY for FWS direction.
- RECORD corrective actions in Comments section of Appendix A.

h. Appendix A questions 7

1) IF problem is found,
THEN PERFORM the following:

- MOVE to safe location as necessary.
- NOTIFY FWS.
- MARK No column on Appendix A.
- RECORD problem in Comments section of Appendix A.
- NOTIFY dispatch to make Facility logbook entry.
- STAND BY for FWS direction.
- RECORD corrective actions in Comments section of Appendix A.

NOTE: *Question 10 does not apply to staged shipments.*

i. Appendix A Question 10

1) IF problem is found with required marking/labeling on storage containers,
THEN PERFORM the following:

- Missing or obscured labels shall be corrected the same day they are discovered

4.3.5 IF any problem conditions exist that cannot be immediately corrected,
THEN PERFORM the following:

j. ENSURE FWS has been notified of problem condition(s).

k. WRITE clear description of condition(s) in Comments section of Appendix A.

l. MARK "No" column on Appendix A.

4.3.6 IF problem was corrected immediately,
THEN ENTER corrective action taken in Comments section of Appendix A.

4.3.7 RECORD deficiencies that are not RCRA items on Appendix A.

4.3.8 EXPLAIN all "No" and "N/A" checked boxes clearly in Comments section of Appendix A, as needed.

4.3.9 RECORD name (print/sign), date, and time in Operator blank at bottom of completed Appendix A

4.3.10 SUBMIT completed Appendix A to FWS for review, signature, notifications, and disposition.

4.4 Weekly CWC RCRA 90-day AA Inspections

4.4.1 Whenever a RCRA inspection cannot be performed within the required frequency,
PROVIDE condition information for why inspection could not be performed in Comment section of appropriate Checklist,
AND NOTIFY ECO (immediately).

4.4.2 OBTAIN current Weekly CWC RCRA 90-day AA(s) Inspection Checklist (Appendix B).

4.4.3 PERFORM Open-Item List check per Section 4.1.

4.4.4 REVIEW Operator Aid, CWC/LLBG-OPA-001, for location of containers to be inspected.

a. RECORD location obtained from appropriate Operator Aid in "Location" block of Appendix B.

4.4.5 COMPLETE Appendix B.

4.4.6 IF problem is found,
THEN PERFORM the following:

- NOTIFY FWS and ECO.
- MOVE to safe location as necessary.
- STAND BY for FWS direction.
- RECORD problem in Comments section of Appendix B.

a. IF problem is found with container marking/labeling and marking/labeling information is available,
THEN PERFORM the following:

1) CORRECT problem immediately.

2) RECORD corrections in Comments section of Appendix B.

b. IF it is not possible to correct RCRA deficiency immediately,
THEN RECORD problem in Comments section of Appendix B.

4.4.7 EXPLAIN all "No" and "N/A" checked boxes clearly in Comments section of Appendix B.

4.4.8 RECORD name (print/sign), date, and time in Operator blank at bottom of completed Appendix B.

4.4.9 SUBMIT completed Appendix B to FWS for review, signature, notifications, and disposition.

4.5 Weekly Inspection of 2727-W & SAMSMs

4.5.1 OBTAIN and COMPLETE Weekly Non-RCRA Inspection Checklist: building 2727-W and SAMSM (Appendix C) every week.

4.5.2 PERFORM Open-Item List check per Section 4.1.

4.5.3 INSPECT outside building/modules as follows:

a. INSPECT for increased fire loading (including tumbleweeds and other windblown material) around active storage areas every week.

b. REMOVE combustibles found.

c. RECORD combustibles that cannot be removed as problem on Appendix C.

NOTE: *Due to a lack of emergency lighting the 2727-W building main entrance door (south side) is to be propped open whenever building is occupied.*

4.5.4 PROP open door
AND INSPECT inside building/modules.

NOTE:
- *2727-W Sodium Storage Building contains five sodium tanks.*
- *Because 2727-W and modules are not temperature controlled, condensate build up on containers often occurs during winter. This condition is temporary and not an abnormal condition as long as source can be readily identified.*
- *Burned out lights do not necessitate abnormal condition if lighting is still sufficient to conduct inspections and perform work.*

4.5.5 INSPECT tank/drum conditions as follows:

d. CHECK tanks/drums show no evidence of spills/leaks, corrosion, or other damage/deterioration.

e. RECORD inspection of item listed in Section C, "tank/drum condition," of Appendix C.

f. INDICATE problem conditions by checking "No" blank on Appendix C for inspection item.

4.5.6 IF problem is corrected immediately,
THEN RECORD corrective action taken in Comments section of Appendix C.

4.5.7 IF problem is found that cannot be immediately corrected,
THEN PERFORM the following:

g. MOVE to safe location as necessary

h. NOTIFY FWS.

i. STAND BY for FWS direction.

j. RECORD problem in Comments section of Appendix C.

4.5.8 EXPLAIN all "No" checked boxes clearly in Comments section of Appendix C.

4.5.9 RECORD name (print/sign), date, and time in Operator blank at bottom of completed Appendix C.

4.5.10 SUBMIT completed Appendix C to FWS for review, signature, notifications, and disposition.

4.6 Weekly Post Indicator Valves & Fire Systems Pressures Inspection

NOTE:
- *Post indicators (diagram in Appendix D - Typical Post Indicator Valve Diagram) are located mainly in traffic median throughout CWC series buildings. These valves have lockable actuator handle, tamper box, and window on the post to check valve position (open/closed).*
- *Steps 4.6.1 through 4.6.7, below, may be performed in most convenient order to complete Appendix E.*

4.6.1 OBTAIN and COMPLETE Weekly CWC Fire System Checklist (Appendix E).

4.6.2 PERFORM Open-Item List check per Section 4.1.

4.6.3 CIRCLE post indicator valve position (Open/Closed or Shut) on Appendix E. **[SR 4.2.1.2]**

4.6.4 IF valve position cannot be verified or is Closed or Shut,
THEN PERFORM the following:

- NOTIFY shift duty officer (SDO) to place facility in Standby mode.
- NOTIFY dispatch to notify Fire Department and to record necessary Facility logbook entries.

4.6.5 IF valve is Open,
THEN VERIFY whether padlock or seal is intact or broken.

4.6.6 On Appendix E, RECORD the following:

k. IF seal is intact,
THEN CIRCLE "Yes" on Appendix E.

l. IF seal is broken,
THEN CIRCLE "No" on Appendix E.

4.6.7 IF valve is Open but seal is broken,
THEN PERFORM the following:

- NOTIFY FWS.
- NOTIFY dispatch to notify Fire Department and to record necessary Facility logbook entries.

4.6.8 REPEAT steps 4.6.1 through 4.6.7 for each post indicator valve supply for each building.

4.6.9 IF discrepancies are found,
THEN NOTIFY (immediately) FWS.

NOTE: *Appendix F - Fire System Water and Air Pressure Gauge Diagram shows approximate location of fire system water pressure gauge and air pressure gauge. Gauges are located on fire system piping in fire riser rooms in each facility.*

4.6.10 COMPLETE the following for all CWC fire riser rooms and 285-W and 286-W buildings:

a. IF auxiliary heaters are in use,
THEN ENSURE the following:

- Controls are in ON position.
- Thermostat position is set so that room temperature remains above 40°F and below 90°F.
- Heater is off floor (usually on cement blocks).

NOTE: 4.6.11 *Temperature is required to be greater than 40°F.*

b. READ room temperature indicator.

c. IF temperature is below 40°F or room heater is not working,
THEN NOTIFY (immediately) FWS.

d. RECORD fire riser room temperature on Appendix E.

e. IF recorded temperature is below 40°F,
THEN CIRCLE in red on Appendix E.

NOTE: *Tank mounted air compressors are located in 2403-WA North and South riser rooms and in 2403-WD West riser room.*

f. For 2403 series buildings with tank mounted air compressor,
PERFORM the following:

1) CHECK that oil sight glass is half or more full.

a) IF oil sight glass is less than half full,
THEN NOTIFY FWS
AND RECORD in Comments section of Appendix E.

NOTE: *While draining the air compressor tank, the air compressor should come on at approximately 80 psi and shut off at approximately 100 psi.*

2) DRAIN condensate from tank.

4.6.12 RECORD water and air pressure on Appendix E.

a. IF 286W-WATER-SW-GAGE-1 or -GAGE-2 is below minimum pressure, THEN NOTIFY (immediately) SDO *to place facility in Standby mode per SWSD-PRO-WM-51684 (WMP-342, Section 4.1), Controlling Facility Access & Waste Movement.*

b. IF 286W-WATER-SW-GAGE-1 or -GAGE-2 is below minimum pressure, THEN NOTIFY (immediately) SDO to notify WRAP of pressures. **[SR 4.2.1.1]**

1) To support NFPA hose stream allowance, IF water pressure gage 286W-WATER-SW-GAGE-1 is less than 101 psi, THEN NOTIFY SDO to contact Water Utilities to increase pressure.

4.6.13 IF pressures are not within operating range shown on Appendix E, THEN PERFORM the following:

- CIRCLE readings in red on Appendix E.
- NOTIFY dispatch to notify FWS and SWP Fire System Engineer.

4.6.14 RECORD deficiencies that cannot be immediately corrected in Comments section of Appendix E.

a. IF a pressure reading is red-circled, THEN ENSURE SWP Fire System Engineer comments are recorded in Comments section of Appendix E.

4.6.15 EXPLAIN all "No" checked boxes clearly in Comments section of Appendix E.

4.6.16 RECORD name (print/sign), date, and time in Operator blank at bottom of completed. Appendix E

4.6.17 SUBMIT completed Appendix E to FWS for review, signature, notifications, and disposition.

4.7 Weekly Emergency Response Trailer Inventory/Inspection

NOTE: *There are two emergency response trailers, and their locations are determined by management.*

4.7.1 DETERMINE location of trailer from FWS.

4.7.2 OBTAIN and COMPLETE Weekly/Quarterly RCRA Emergency Response Trailer Inventory Checklist (Appendix L).

4.7.3 PERFORM Open-Item List check per Section 4.1.

NOTE: *Seals are to be initialed and dated by the person applying the seal.*

4.7.4 IF seal is broken, and/or seal is missing initials/date,
THEN PERFORM the following:

a. CIRCLE "No" next to Seal Intact/Initialed/Dated on Appendix L.

b. VERIFY no equipment in kit is damaged.

c. COMPLETE Appendix L.

d. NOTIFY FWS.

e. REPLACE missing, damaged, or partially used items.

f. RESEAL emergency response trailer.

g. INITIAL/DATE seal.

4.7.5 IF seal is not broken and initials/date is present,
THEN CIRCLE "Yes" next to Seal Intact/Initialed/Dated on Appendix L.

4.7.6 RECORD deficiencies that cannot be immediately corrected in Comments section of Appendix L.

4.7.7 RECORD name (print/sign), date, and time in Operator blank at bottom of completed Appendix L.

4.7.8 SUBMIT completed Appendix L to FWS for review, signature, notifications, and disposition.

4.8 Quarterly Emergency Response Trailer Inventory/Inspection

NOTE: *The quarterly inspection is completed in conjunction with Section 4.7, using Appendix L.*

4.8.1 INSPECT (on a quarterly basis) contents of Emergency Response Trailers for shelf life/expiration
AND REPLACE as appropriate.

4.9 Monthly Housekeeping Inspection

4.9.1 OBTAIN and COMPLETE Monthly Non-RCRA CWC Housekeeping Inspection Checklist (Appendix G).

4.9.2 PERFORM Open-Item List check per Section 4.1.

NOTE:
- *At CWC FWS's discretion:*
  - *All CWC buildings may be consolidated on one Checklist, or*
  - *One Checklist may be used for a group of buildings, or*

  One Checklist may be used for each building
- *The following buildings/areas should be inspected:*
  - *2401-W, 2402-W, 2402-WB through 2402-WL*
  - *2403-WA through 2403-WD*
  - *2404-WA*
  - *Waste Receiving & Staging Area (WRSA) (CWC SA1)*
  - *Mixed Waste Storage Pad (MWSP) (CWC SA2)*
  - *Low Flashpoint Storage Modules (LFSM)*
  - *All Alkali Metal Waste Storage Modules (AMW)*
  - *2420-W Storage Pad*
  - *2727-W Sodium Storage Building*
  - *All South Alkali Metal Storage Modules (SAMSM)*

  Outside Storage Areas

4.9.3 IF criteria for item are met,
THEN CHECK "Yes" column.

4.9.4 IF criteria is not met,
THEN CHECK "No" column.

a. RECORD problem in Comments section of Appendix G.

4.9.5 IF problem is corrected immediately,
THEN RECORD corrective action taken in Comments section of Appendix G.

4.9.6 RECORD deficiencies that cannot be immediately corrected in Comments section of Appendix G.

NOTE: *All RCRA "No" or "N/A" data points are required to have an explanation in the Comments section of the inspection sheet. An explanation for non-RCRA "No" or "N/A" data points is not required.*

4.9.7 EXPLAIN all "No" and "N/A" checked boxes clearly in Comments section of Appendix G.

4.9.8 RECORD name (print/sign), date, and time in Operator blank at bottom of completed Appendix G.

4.9.9 SUBMIT completed Appendix G to FWS for review, signature, notifications, and disposition.

4.10 Monthly Fire Extinguishers Inspection

NOTE: *HNF-IP-0263, Building Emergency Plan for the Central Waste Complex, contains fire extinguisher locations within SWP buildings.*

4.10.1 OBTAIN Monthly RCRA CWC Fire Extinguisher Inspection Checklist (Appendix H) for each fire extinguisher to be inspected.

4.10.2 PERFORM Open-Item List check per Section 4.1.

4.10.3 RECORD data requested for each fire extinguisher inspected on Appendix H.

a. DETERMINE extinguisher expiration year.

1) CHECK extinguisher label, or bottom of extinguisher, for year it was manufactured.

2) IF current year is six or more years greater than manufactured year, THEN CHECK "Yes" on Appendix H, AND RECORD in Comments section the extinguisher needs to be replaced.

4.10.4 CHECK fire exits, paths to exit, and area around fire-fighting equipment to ensure they are not obstructed (accessible).

4.10.5 PERFORM visual inspection of fire extinguisher.

a. CHECK that operating instructions on extinguisher are legible and face outward.

b. EXAMINE for physical damage, corrosion, leakage, or clogged nozzle.

c. CHECK that seal is intact (not broken or missing).

d. RECORD discrepancies in Comments section of Appendix H.

e. INITIAL and DATE tag on fire extinguisher indicating visual inspection of extinguisher has been completed.

4.10.6 IF problem is corrected immediately, THEN RECORD corrective action taken in Comments section of Appendix H.

4.10.7 RECORD deficiencies that cannot be immediately corrected in Comments section of Appendix H.

4.10.8 EXPLAIN all "No" and "N/A" checked boxes in Comments section of Appendix H

4.10.9 RECORD name (print/sign), date, and time in Operator blank at bottom of completed Appendix H.

4.10.10 SUBMIT completed Appendix H to FWS for review, signature, notifications, and disposition.

4.11 Monthly/Quarterly Spill Kits Inspection

NOTE:
- *Self-contained spill kits are located as follows:*
  - *Outside 2401-W Storage Building southwest corner*
  - *Along center roadway of 2402-W and 2402-WL*
  - *Outside east entrance to 2403-WA*
  - *At Waste Receiving and Staging Area (SA1)*
  - At 2404-WA
- *There are two spill kit drums at CWC. Spill kit drums contain absorbent materials to confine liquid spills and are sealed with gum-backed paper seal. They are located near 2402-WD and 2402-WH.*

4.11.1 OBTAIN and COMPLETE Monthly/Quarterly RCRA CWC Spill Kit Inventory Checklist (Appendix I).

4.11.2 PERFORM Open-Item List check per Section 4.1.

4.11.3 CHECK type of inspection (monthly/quarterly).

4.11.4 IF seal is broken,
THEN PERFORM the following:

a. CHECK "No" next to Seal is Intact/Initialed/Dated.

b. VERIFY no equipment in kit is damaged.

c. COMPLETE Appendix I.

d. NOTIFY FWS.

e. REPLACE missing, damaged, or partially used items.

f. RESEAL spill kit.

4.11.5 IF spill kit seal is not broken,
THEN CHECK "Yes" next to Seal is Intact/Initialed/Dated on Appendix I.

NOTE: *The quarterly inspection (January, April, July, October) is completed in conjunction with the monthly inspection using Appendix I.*

4.11.6 PERFORM quarterly inspection.

a. OPEN spill kit.

b. CLEAN and INSPECT contents for deterioration.

c. REPLACE spill kit equipment as necessary
AND RESEAL spill kit.

d. COMPLETE quarterly inspection section of Appendix I.

4.11.7 RECORD deficiencies that cannot be immediately corrected in Comments section of Appendix I.

4.11.8 RECORD name (print/sign), date, and time in Operator blank at bottom of completed Appendix I.

4.11.9 SUBMIT completed Appendix I to FWS for review, signature, notifications, and disposition.

4.12 Monthly CWC SAA(s) Inspections

4.12.1 Whenever a RCRA inspection cannot be performed within the required frequency,
PROVIDE condition information for why inspection could not be performed in Comment section of appropriate Checklist,
AND NOTIFY ECO (immediately).

4.12.2 OBTAIN current Monthly CWC SAA(s) Inspections Checklist (Appendix O) and Open-Item List for CWC.

4.12.3 PERFORM Open-Item List check per Section 4.1.

4.12.4 REVIEW Operator Aid, CWC/LLBG-OPA-001, for location of containers to be inspected.

4.12.5 IF facility/module has any open items on Open-Item List,
THEN RECORD "Open item log #" in Comments section of Appendix O.

4.12.6 EXPLAIN all "No" and "N/A" checked boxes in Comments section of Appendix O.

4.12.7 COMPLETE Appendix O for each location.

4.12.8 RECORD name (print/sign), date, and time in Operator blank at bottom of completed Appendix O.

4.12.9 IF problem is found (a "No" answer for any question except 8),
THEN PERFORM the following:

a. MOVE to safe location as necessary.

b. NOTIFY FWS for direction.

c. RECORD problem and question number in Comments section of Appendix O.

d. STAND by for FWS direction.

4.12.10 IF answer to question 8 is NO,
THEN CORRECT problem immediately.

a. RECORD correction and question number in Comments section of Appendix O.

b. IF it is not possible to correct problem,
THEN RECORD problem and question number in Comments section on Appendix O.

4.12.11 RECORD name (print/sign), date, and time in Operator blank at bottom of completed Appendix O.

4.12.12 SUBMIT completed Appendix O to FWS for review, signature, notifications, and disposition.

4.12.13 (FWS) AFTER corrective action(s) are taken,
THEN PERFORM the following:

a. ENTER corrective action(s) taken in Comments section of Appendix O.

b. SIGN and DATE Appendix O.

c. FORWARD Appendix O to records management specialist.

4.13 Monthly First Aid Kit & Personal Particulate Eyewash Bottle Check

4.13.1 OBTAIN Monthly CWC First Aid/Personal Particulate Eyewash Checklist (Appendix J).

4.13.2 PERFORM Open-Item List check per Section 4.1.

4.13.3 DETERMINE if seal to first aid kit is broken.

4.13.4 IF seal is broken,
THEN PERFORM the following:

d. CIRCLE "No" in seal intact column.

e. RECORD any missing items.

f. REPLACE missing items.

g. RESEAL kit.

4.13.5 IF seal is not broken,
THEN CIRCLE "Yes" on Appendix J.

4.13.6 VERIFY personal particulate eyewash bottle seals are intact.

4.13.7 IF personal particulate eyewash bottle seals are broken,
THEN PERFORM the following:

a. RECORD on. Appendix J

b. NOTIFY FWS.

c. REPLACE personal particulate eyewash bottle.

4.13.8 VERIFY expiration dates on personal particulate eyewash bottles.

4.13.9 ORDER new personal eyewash bottles before expiration date.

4.13.10 IF dates are expired,
THEN PERFORM the following:

a. RECORD on Checklist.

b. REMOVE from service.

c. POUR contents of personal particulate eyewash bottles down drain.

4.13.11 RECORD deficiencies that cannot be immediately corrected in Comments section of Appendix J.

4.13.12 EXPLAIN all "No" checked boxes in Comments section of. Appendix J

4.13.13 RECORD name (print/sign), date, and time in Operator blank at bottom of completed Appendix J.

4.13.14 SUBMIT completed Appendix J to FWS for review, signature, notifications, and disposition.

4.14 Monthly Communications & Windsock Inspection

4.14.1 OBTAIN Monthly Non-RCRA CWC Telephone and Windsock Inspection Checklist (Appendix K).

4.14.2 PERFORM Open-Item List check per Section 4.1.

4.14.3 CHECK that telephones listed on Appendix K are working properly.

4.14.4 INSPECT windsock for damage

4.14.5 RECORD results on Appendix K.

4.14.6 IF problem is corrected immediately,
THEN RECORD corrective action taken in Comments section of Appendix K.

4.14.7 RECORD deficiencies that cannot be immediately corrected in Comments section of Checklist (Appendix K).

4.14.8 EXPLAIN all "No" and "Unsat" boxes in Comments section of Appendix K.

4.14.9 RECORD name (print/sign), date, and time in Operator blank at bottom of completed Appendix K.

4.14.10 SUBMIT completed Appendix K to FWS for review, signature, notifications, and disposition.

4.15 Monthly Combustible Loading Surveillance [TSR 5.7.1.a]

4.15.1 OBTAIN Monthly Combustible Loading Surveillance Checklist (Appendix P).

4.15.2 PERFORM Open-Item List check per Section 4.1.

4.15.3 For each item listed, CHECK compliance with combustible loading program.

a. RECORD compliance on Appendix P by checking "Yes" or "No."

b. IF any answer on Appendix P is "Yes",
THEN NOTIFY SDO.

c. (SDO) IF corrections are required,
THEN RECORD correction in Comments section of Appendix P
AND SIGN next to comment.

4.15.4 RECORD name (print/sign), date, and time in Operator blank at bottom of completed Appendix P.

4.15.5 SUBMIT completed Appendix P to FWS for review, signature, notifications, and disposition.

NOTE: *The date the Monthly ACMP Surveillance is due to be completed and returned to the ACMP Manager is on the Monthly SWOC ACMP Container Surveillance sheet.*

4.16 Monthly ACMP Surveillance

4.16.1 OBTAIN Monthly SWOC ACMP Container Surveillance sheet from ACMP Manager.

4.16.2 INSPECT each ACMP container listed on Surveillance sheet with respect to its Action Plan, particularly:

- Labeling
- Handling, Storage, and/or Segregation

4.16.3 IF any discrepancies are found,
THEN RECORD discrepancies on Surveillance sheet
AND NOTIFY (immediately) ACMP Evaluator and FWS.

4.16.4 EXPLAIN all "No" checked boxes in Comments section of Surveillance sheet.

4.16.5 IF no discrepancies exist,
THEN RECORD on Surveillance sheet that no discrepancies were found.

4.16.6 RECORD name (print/sign), date, and time Surveillance sheet.

4.16.7 SUBMIT completed Monthly SWOC ACMP Container Surveillance sheets to FWS for review, signature, notifications, and disposition.

a. (FWS) RETURN completed Surveillance sheet to ACMP manager by due date recorded on Surveillance sheet.

4.17 End of Workday Security Check

4.17.1 OBTAIN CWC End of Workday Security Checklist (Appendix N).

4.17.2 PERFORM Open-Item List check per Section 4.1.

4.17.3 COMPLETE checklist (Appendix N).

a. IF problem is corrected immediately,
THEN RECORD corrective action taken in Comments section of Appendix N.

b. RECORD deficiencies that cannot be immediately corrected in Comments section of Appendix N.

4.17.4 NOTIFY dispatch to record in the Facility logbook that end-of-workday security check is complete.

4.17.5 IF abnormal condition exists,
THEN PERFORM the following:

a. MOVE to safe location.

b. NOTIFY FWS.

c. NOTIFY dispatch to record condition in Facility logbook.

d. STAND BY for direction from FWS.

4.17.6 EXPLAIN all "No" and "N/A" checked boxes in Comments section of Appendix N.

4.17.7 RECORD name (print/sign), date, and time in Operator blank at bottom of completed Appendix N.

4.17.8 SUBMIT completed Appendix N to FWS for review, signature, notification, and disposition.

4.18 (Operations FWS) Additional Review of RCRA Checklists

4.18.1 ENSURE problems revealed by a RCRA inspection are remedied on a schedule which prevents hazards to public health and the environment.

4.18.2 COLLECT all Weekly CWC RCRA/Non-RCRA Inspection Checklists (Appendix A).

a. ENSURE there is one RCRA inspection Checklist for each building/area for each calendar week.

b. REVIEW inspection Checklists for addition of new RCRA action items.

c. REVIEW inspection Checklists to ensure there is a comment recorded for each "No" or "N/A".

d. IF there are any RCRA action items, comments, or observations, THEN FORWARD a copy of inspection Checklist to ECO.

4.18.3 COLLECT all weekly CWC Weekly RCRA 90-day AA Inspections Checklists (Appendix B).

a. ENSURE there is one 90-day inspection Checklist for each 90-day accumulation area listed on operator aid CWC/LLBG-OPA-001, *90-Day/SAA/SA Inventory*, for each week the area is listed on Checklist.

b. REVIEW inspection Checklists for addition of new RCRA action items.

c. REVIEW inspection Checklists to ensure there is a comment recorded for each "No" or "N/A".

d. IF there are any RCRA action items, comments, or observations, THEN FORWARD a copy of inspection Checklist to ECO.

4.18.4 COLLECT all Monthly CWC SAA(s) Inspections Checklists (Appendix O).

a. ENSURE there is one Satellite Accumulation Area (SAA) inspection Checklist for each SAA for each calendar month.

b. REVIEW inspection Checklists for addition of new RCRA action items.

c. REVIEW inspection Checklists to ensure there is a comment recorded for each "No" or "N/A".

d. IF there are any RCRA action items, comments, or observations, THEN FORWARD a copy of inspection Checklist to ECO.

5.0 FORMS

None

6.0 RECORD IDENTIFICATION

- RCRA inspection records must be kept at the facility for at least five years from the date of inspection. This requirement may be satisfied by electronic records storage or by storage in RHA or other records storage locations on the Hanford site.
- All records are required to be managed in accordance with PRC-PRO-IRM-10588, *Records Management Processes*.

Records Capture Table

Name of Record	Submittal Responsibility	Retention Responsibility
Weekly CWC RCRA/Non-RCRA Inspection Checklists (Appendix A)	Operations Management	Facility Records
Weekly CWC RCRA 90-day AA Inspection Checklist (Appendix B)		
Weekly Non-RCRA Inspection Checklist: Bldg 2727-W & SAMSM (Appendix C)		
Weekly CWC Fire System Checklist (Appendix E)		
Monthly Non-RCRA CWC Housekeeping Inspection Checklist (Appendix G)		
Monthly RCRA CWC Fire Extinguisher Checklist Page 1 of 12 (Appendix H)		
Monthly/Quarterly RCRA CWC Spill Kit Inventory Checklist (Appendix I)		
Monthly RCRA CWC First Aid Kit & Personal Eyewash Bottle Checklist (Appendix J)		
Monthly Non-RCRA CWC Telephone & Windsock Inspection Checklist (Appendix K)		
Weekly/Quarterly RCRA Emergency Response Trailer Inventory Checklist (Appendix L)		
Monthly Non-RCRA AED Inspection Checklist (Appendix M)		
CWC End of Workday Security Checklist (Appendix N)		
Monthly CWC SAA(s) Inspections Checklist (Appendix O)		
Monthly Combustible Loading Surveillance Checklist (Appendix P)	SDO	
Facility Logbook	Operations Management	
Monthly SWOC ACMP Container Surveillance Sheet	Operations Management	ACMP Manager

7.0 SOURCES

7.1 Requirements

40 CFR 265, *Interim Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities*
40 CFR 761, *Polychlorinated Biphenyls (PCBs) Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions*
WAC 173-303, *Dangerous Waste Regulations*

7.2 Commitments

CRRS Action CR-2012-1665
CRRS Action CR-2013-0007

7.3 References

HNF-15280, *Technical Safety Requirements*
HNF-21239, *Fire Hazards Analysis (FHA)*
PRC-RD-EP-15332, *Environmental Protection Requirements*
PRC-PRO-EP-15333, *Environmental Protection Processes*
PRC-PRO-IRM-10588, *Records Management Processes*
SWSD-PRO-WM-51684 (WMP-342, Section 4.1), *Controlling Facility Access & Waste Movement*

Appendix A - Weekly CWC RCRA/Non-RCRA Inspection Checklists

Location/Facility/Module:

Weekly CWC RCRA Checklist				
#	**Yes**	**No**	**N/A**	**Area Inspection**
1				Containment curbing and flooring is free of scratches that penetrate to the concrete, cracks, or gaps and is sufficiently impervious to contain leaks, spills, and accumulated rainfall?
2				Area is generally dry and free of accumulated water. There is no standing and/or unexpected water or snow accumulation in or around area?
3				Areas where dangerous waste may be accumulated have "Danger – Unauthorized Personnel Keep Out" (or an equivalent legend) and "No Smoking" signs posted?
4				Postings are accurate, intact, visible, legible and in good condition?
5				Secondary containment system is free of liquid? If "No", notify FWS and go to SW-080-003.
6				Spill pallets that are in use are free of liquids and in good condition
#	**Yes**	**No**	**N/A**	**Container Inspection**
7				Container integrity is not compromised by punctures, dents, penetrating scratches, loose lids, bulging, excessive corrosion or other physical damage/deterioration. **[TSR 5.6.4.b]**
8				Containers are closed, are stored in a manner which will not rupture the containers or cause them to leak, and show no evidence of spillage or leakage, such as moisture on the sides or underneath?
9				Container top does not have excessive buildup of dirt/debris that would possibly interfere with the proper operation of the drum's ventilation system (such as, clogging of NucFils).
10				Container marking/labeling is intact, unobscured, legible and in good condition?
11				Dangerous/hazardous waste containers are marked as "hazardous" or "dangerous" and have major risk label, as applicable?
13				Aisle space between rows of containers appears to be at least 36 inches? **[FHA SWOC Key 1.3.1.13][FHA Key #10]**
13				Containers are stored in rows no more than 2 wide?
14				Containers are elevated (palletized)?
Weekly CWC Non-RCRA Checklist				
#	**Yes**	**No**	**N/A**	**Area Inspected/Description of Non-RCRA Items**
15				Chain barricades around area are intact and in good condition?
16				Lighting is adequate to complete inspection (where applicable)?
17				Areas in and around waste stored in the facilities/modules are free of combustibles such as tumbleweeds, paper, rags, trash, empty wood pallets, etc.? **[TSR 5.7.1.b&c][TSR 5.6.4.h]**
18				Roadways are clear and unobstructed. Fire fighting vehicles have free and easy access to the area. Exits are clear and unobstructed?
19				PCB label at facilities/modules entrances are intact, unobscured, legible and in good condition (where applicable)?
20				Pallet condition is adequate to ensure module stability.
21				Aisle space between rows of containers appears to be at least 36 inches? **[FHA SWOC Key 1.3.1.13][FHA Key #10]**
22				Waste containers staged or stored outside are no higher than 2 tiers. **[TSR 5.6.4.a]**
23				Space between inside waste array zones is > 12 ft (for inside zones) or > 33 ft (for outside zones) and free of combustibles. **[TSR 5.6.4.g & h]**
24				Third-tier drums are banded horizontally with metal band (single drum banded to pallet) **[TSR 5.6.4.a]**

Comments:

Operator (print/sign/date/time):

FWS (print/sign/date/time):

NOTE: ***All RCRA "No" or "N/A" data points are required to have an explanation in the Comments section of the inspection sheet. An explanation for non-RCRA "No" or "N/A" data points is not required.***

Appendix B - Weekly CWC RCRA 90-day AA Inspections

Location:

#	Yes	No	N/A	Inspection Item
1				Is the area controlled or locked/or is container locked?
2				Are the containers closed except when adding or removing waste?
3				Are containers in good condition (not deteriorated, badly rusted, bulging, or dented)?
4				Is the area free of any evidence of leaks?
5				Is the container marked as "hazardous waste" or "dangerous waste"?
6				Are the major risks (toxic, corrosive, etc.) clearly identified on each container, as applicable?
7				Are the labels and markings facing outward and in good condition?
8				Is there secondary containment for liquid wastes?
9				Are containers elevated?
10				Is housekeeping satisfactory (containers in dry location, no trash or debris, area maintained in an orderly condition, no uncontainerized dangerous waste, etc.)?

Comments/Observations:

Operator (print/sign/date/time):

FWS (print/sign/date):

NOTE: *Operator Aid CWC/LLBG-OPA-001 provides locations of containers to be inspected.*

Appendix C - Weekly Non-RCRA Inspection Checklist: Bldg 2727-W & SAMSM

A. Outside Building/Module	**2727-W**		**SAMSM**	
	Yes	**No**	**Yes**	**No**
Chemicals (other than fire extinguisher) are > 100 ft from building/module.				
Combustibles are > 50 ft from building/module.				
Exit unobstructed				
Signs posted and readable				
B. Inside Building/Module	**Yes**	**No**	**Yes**	**No**
Signs Posted and Readable			N/A	N/A
Lighting Operating			N/A	N/A
Fire Alarms Undisturbed			N/A	N/A
Piping Undisturbed			N/A	N/A
Moisture Not Present				
Roof Not Leaking				
Wind Damage Not Present				
Suspicious Objects or Packages Not Present				
Building/Module Secured				
C. Tank/Drum Condition	**Yes**	**No**	**Yes**	**No**
Leaks Not Present				

Sodium Storage Tank Nitrogen Pressure (2727-W) ***RECORD gauge readings***				
Tank 1	**Tank 2**	**Tank 3**	**Tank 4**	**Tank 5**
(≥ 3 psig)*	(≥ 3 psig)*	(≥ 3 psig)*	(≥ 3 psig)*	(≥ 3 psig)*

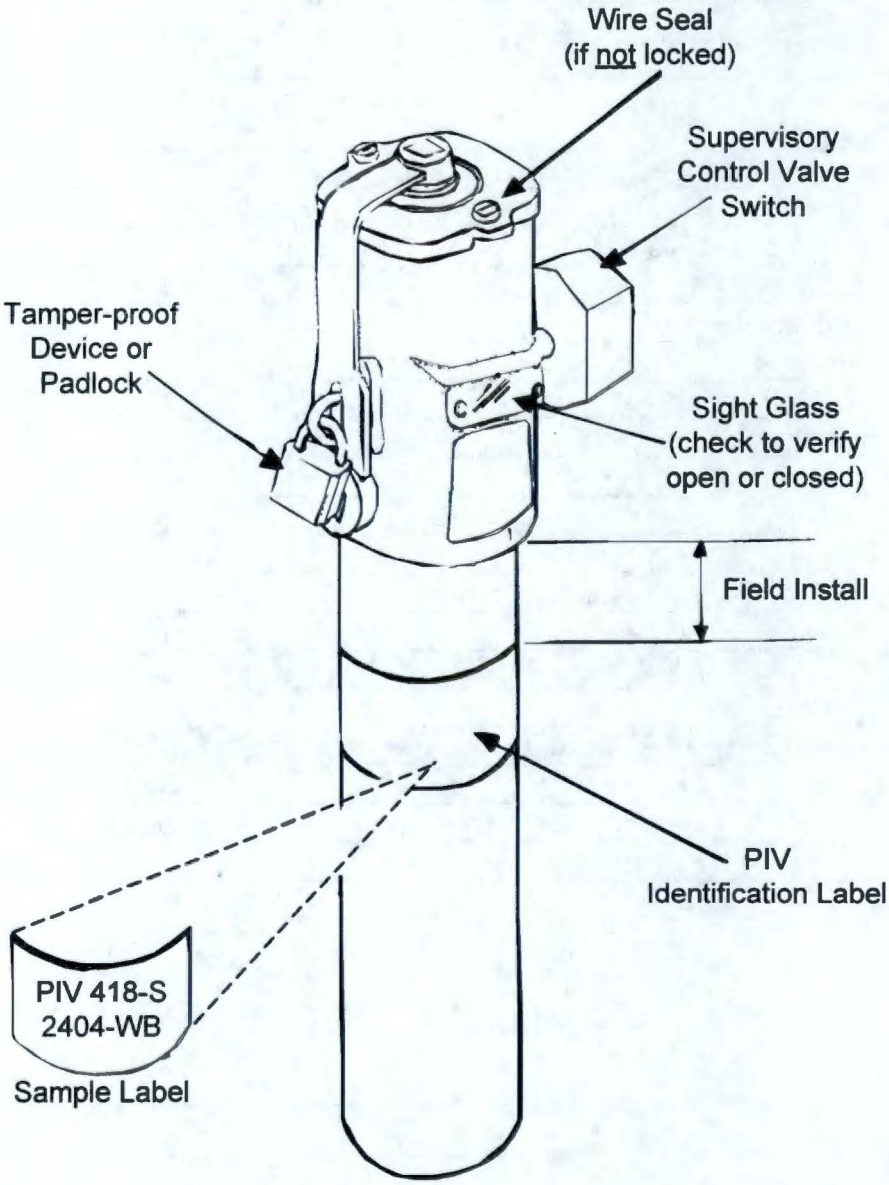
Comments:

Operator (print/sign/date/time):

FWS (print/sign/date):

* *Normal reading for the sodium storage tanks nitrogen pressure gauges is greater than or equal to 3 psig.*

Appendix D - Typical Post Indicator Valve Diagram



Appendix E - Weekly CWC Fire System Checklist (Page 1 of 2)
[SR 4.2.1.1 & SR 4.2.1.2]

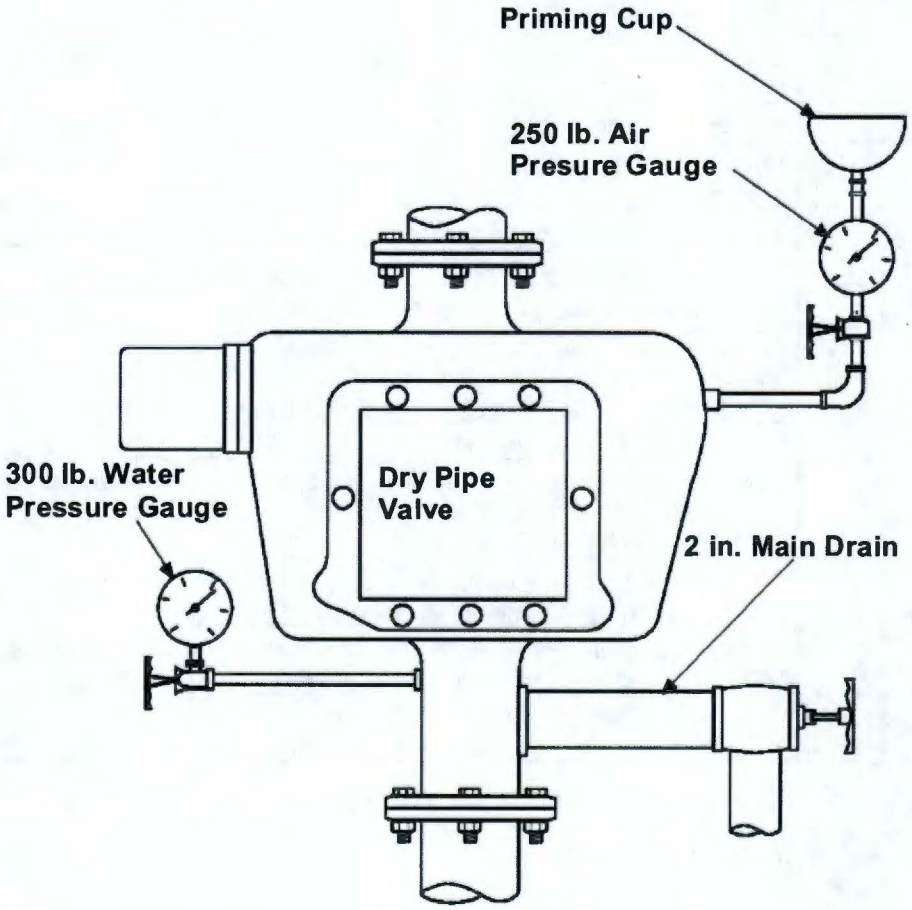
PIV Control Valve	Building Fire Riser Room That PIV Controls	PIV Position (Should be Open) (Circle one)	Seal/Lock Intact (Circle one)
173-S	(BFP) 285-W	Open / Closed	Yes / No
174-S	2401W	Open / Closed	Yes / No
190-S		N/A	Yes / No
254-S		Open / Closed	Yes / No
(1)292-S	2403WD (W)	Open / Closed	Yes / No
278-S	2402W	Open / Closed	Yes / No
(1)279-S	2402WB	Open / Closed	Yes / No
280-S	2402WC	Open / Closed	Yes / No
(1)281-S	2402WD	Open / Closed	Yes / No
(1)293-S	2403WD (E)	Open / Closed	Yes / No
294-S		Open / Closed	Yes / No
(1)282-S	2402WE	Open / Closed	Yes / No
(1)283-S	2402WF	Open / Closed	Yes / No
(1)284-S	2402WG	Open / Closed	Yes / No
(1)285-S	2402WH	Open / Closed	Yes / No
(1)295-S	2403WC (S)	Open / Closed	Yes / No
296-S		Open / Closed	Yes / No
(1)286-S	2402WI	Open / Closed	Yes / No
(1)247-S	2402WJ	Open / Closed	Yes / No
(1)288-S	2402WK	Open / Closed	Yes / No
(1)289-S	2402WL	Open / Closed	Yes / No
298-S		Open / Closed	Yes / No
(1)297-S	2403WC (N)	Open / Closed	Yes / No
271-S		Open / Closed	Yes / No
(1)270-S	2403WA (S)	Open / Closed	Yes / No
299-S		Open / Closed	Yes / No
269-S		Open / Closed	Yes / No
(1)300-S	2403WB (S)	Open / Closed	Yes / No
(1)301-S	2403WB (N)	Open / Closed	Yes / No
305-S		Open / Closed	Yes / No
268-S		Open / Closed	Yes / No
273-S		Open / Closed	Yes / No
413-S		Open / Closed	Yes / No
(1)272-S	2403WA(N)	Open / Closed	Yes / No
258-S	(BFP) 286-W	Open / Closed	Yes / No
(1)260-S	2404WA	Open / Closed	Yes / No
261-S		Open / Closed	Yes / No
262-S		Open / Closed	Yes / No
259-S		Open / Closed	Yes / No
Comments:			
Operator (print/sign/date/time):			
FWS (print/sign/date):			
(1) Indicates a PIV LCO Surveillance requirement. PIV position SHOULD be open. If not, notify SDO. **[SR 4.2.1.2]**			

Appendix E - (Cont.) Weekly CWC Fire System Checklist (Page 2 of 2) [SR 4.2.1.1 & SR 4.2.1.2]

Building Fire Riser Room Location of Gages/Temp. Indicator	Water System Pressure Gage Reading (85-165 psi)	Air System Pressure Gage Reading (35-49 psi)	Temperature Indicator Reading (3)(≥ 40°F)
2401W			
2402W			
2402WB			
2402WC			
2402WD			
2402WE			
2402WF			
2402WG			
2402WH			
2402WI			
2402WJ			
2402WK			
2402WL			
(1)2403WA(N)			
(1)2403WA (S)			
2403WB (N)			
2403WB (S)			
2403WC (N)			
2403WC (S)			
2403WD (E)			
(1)2403WD (W)			
2404WA			
285-W			
286-W			
286-W Water Pressure Gage	**Water Pressure Gage Reading**	**Calibration Date Current?**	**Signs of Physical Damage?**
(2)(4)**286W-WATER-SW-GAGE-1** *If less than minimum pressure (94 psi), notify SDO to place facility in Standby mode per WMP-342, Section 4.1.*		Yes / No	Yes / No
(2)**286W-WATER-SW-GAGE-2** *If less than minimum pressure (88 psi), notify SDO to place facility in Standby mode per WMP-342, Section 4.1.*		Yes / No	Yes / No
Comments:			
Operator (print/sign/date/time):			
FWS (print/sign/date):			

(1) Indicates 2403 building with tank mounted air compressor. Check oil sight glass and Drain condensate from tank.
(2) Indicates a water pressure gage LCO Surveillance requirement. **[SR 4.2.1.1]**
(3) If temperature is greater than 99°F, notify facility Fire System Engineer.
(4) To support NFPA hose stream allowance, if water pressure gage 286W-WATER-SW-GAGE-1 is less than 101 psi, notify SDO to contact Water Utilities to increase pressure.

Appendix F - Fire System Water & Air Pressure Gauge Diagram



Appendix G - Monthly Non-RCRA CWC Housekeeping Inspection Checklist

Area Inspected:

#	Yes	No	N/A	Inspection Items
1				Floors and corridors are clean, dry, and free of obstructions?
2				Area is free from trash or refuse; trash receptacles are not full?
3				Combustibles are limited to the minimum required for operations, and are stored properly to reduce fire danger?
4				Electrical outlets are not overloaded; electrical cords are not frayed or worn?
5				Hazard postings (radiological, flammable, etc.) are appropriately placed and in good repair?
6				Equipment and materials are properly stored and in good condition?
7				System and component labeling is in place and in good condition?
8				Fire exits and paths to the exits are easily accessible? **[FHA SWOC Key 1.3.1.13]**
9				Walking surfaces are clear and unobstructed (rocked areas are even, not rutted, ditched, or disturbed in a manner that presents a hazard)?
10				Locks are in good working condition?
11				Plastic pallets, plastic slip-sheets, plastic overpacks, plastic overpack drums, plastic spill retention pallets and plastic drum retainers are not in use in CWC buildings. **[FHA CWC Key 1.3.2.7]**
12				Area 33 ft around 2402 bldgs, 2403 bldgs, 2404WA, low flash point modules, and outside waste storage areas is free of vegetation?
13				Compressed gas cylinders in North Compressed Gas Storage Area (West of MO-760) are stored per applicable Fire Permit.
14				Compressed gas cylinders in South Compressed Gas Storage Area (West of MO-616) are stored per applicable Fire Permit.

Comments:

Operator (print/sign/date/time):

FWS (print/sign/date):

Appendix H - Monthly RCRA CWC Fire Extinguisher Inspection Checklist (Page 1 of 11)

Fire Extinguisher Inspections Page 1 of 11 (Use check mark to indicate condition)

Building Number: Central Waste Complex **Area**: 200W **Month & Year:**

Station Number	Extinguisher Type	Extinguisher in Place		Accessible		Visual Inspection Complete		Gauge Reading Normal			Expiration Year*		Location	Comments
		Y	N	Y	N	Y	N	Y	N	N/A	Y	N		
1	ABC												2401W	
2	ABC												2401W	
5	ABC												2402W	
6	ABC												2402W	
7	ABC												CWC Receiving Dock	
8	ABC												2402WB	
9	ABC												2402WB	
10	ABC												2402WC	
11	ABC												2402WC	
12	ABC												2402WD	
13	ABC												2402WD	
14	ABC												2402WE	
15	ABC												2402WE	
16	ABC												2402WF	
17	ABC												2402WF	
18	ABC												2402WG	
19	ABC												2402WG	

Operator (print/sign/date/time): **FWS (sign/date):**

* *If current year is six or more years greater than manufactured year, then extinguisher has expired and should be replaced.*

Appendix H - (Cont.) Monthly RCRA CWC Fire Extinguisher Inspection Checklist (Page 2 of 11)

Fire Extinguisher Inspections Page 2 of 11 (Use check mark to indicate condition)

Building Number: Central Waste Complex **Area**: 200W **Month & Year:**

Station Number	Extinguisher Type	Extinguisher In Place		Accessible		Visual Inspection Complete		Gauge Reading Normal			Expiration Year*		Location	Comments
		Y	N	Y	N	Y	N	Y	N	N/A	Y	N		
20	ABC												2402WH	
21	ABC												2402WH	
22	ABC												2402WI	
23	ABC												2402WI	
24	ABC												2402WJ	
25	ABC												2402WJ	
26	ABC												2402WK	
27	ABC												2402WK	
28	ABC												2402WL	
29	ABC												2402WL	
30	ABC												2403WA	
31	ABC												2403WA	
32	ABC												2403WA	
33	ABC												2403WA	
34	ABC												2403WA	
35	ABC												2403WA	
36	ABC												2403WA	

Operator (print/sign/date/time): **FWS (sign/date):**

* *If current year is six or more years greater than manufactured year, then extinguisher has expired and should be replaced.*

Appendix H - (Cont.) Monthly RCRA CWC Fire Extinguisher Inspection Checklist (Page 3 of 11)

Fire Extinguisher Inspections Page 3 of 11 (Use check mark to indicate condition)

Building Number: Central Waste Complex **Area**: 200W **Month & Year:**

Station Number	Extinguisher Type	Extinguisher in Place		Accessible		Visual Inspection Complete		Gauge Reading Normal			Expiration Year*		Location	Comments
		Y	N	Y	N	Y	N	Y	N	N/A	Y	N		
37	ABC												2403WA	
38	ABC												2403WA	
39	ABC												2403WA	
40	ABC												2403WA	
41	ABC												2403WA	
42	ABC												2403WA	
43	ABC												2403WA	
44	ABC												2403WA	
45	ABC												2403WA	
46	ABC												2403WB	
47	ABC												2403WB	
48	ABC												2403WB	
49	ABC												2403WB	
50	ABC												2403WB	
51	ABC												2403WB	
52	ABC												2403WB	
53	ABC												2403WB	
54	ABC												2403WB	
55	ABC												2403WB	

Operator (print/sign/date/time): **FWS (sign/date):**

* *If current year is six or more years greater than manufactured year, then extinguisher has expired and should be replaced.*

Appendix H - (Cont.) Monthly RCRA CWC Fire Extinguisher Inspection Checklist (Page 4 of 11)

Fire Extinguisher Inspections Page 4 of 11 (Use check mark to indicate condition)

Building Number: Central Waste Complex **Area**: 200W **Month & Year:**

Station Number	Extinguisher Type	Extinguisher in Place		Accessible		Visual Inspection Complete		Gauge Reading Normal			Expiration Year*		Location	Comments
		Y	N	Y	N	Y	N	Y	N	N/A	Y	N		
56	ABC												2403WB	
57	ABC												2403WB	
58	ABC												2403WB	
59	ABC												2403WB	
60	ABC												2403WB	
61	ABC												2403WB	
62	ABC												2403WC	
63	ABC												2403WC	
64	ABC												2403WC	
65	ABC												2403WC	
66	ABC												2403WC	
67	ABC												2403WC	
68	ABC												2403WC	
69	ABC												2403WC	
70	ABC												2403WC	
71	ABC												2403WC	
72	ABC												2403WC	

Operator (print/sign/date/time): **FWS (sign/date):**

* *If current year is six or more years greater than manufactured year, then extinguisher has expired and should be replaced.*

Appendix H - (Cont.) Monthly RCRA CWC Fire Extinguisher Inspection Checklist (Page 5 of 11)

Fire Extinguisher Inspections Page 5 of 11 (Use check mark to indicate condition)

Building Number: Central Waste Complex **Area**: 200W **Month & Year:**

Station Number	Extinguisher Type	Extinguisher in Place		Accessible		Visual Inspection Complete		Gauge Reading Normal			Expiration Year*		Location	Comments
		Y	N	Y	N	Y	N	Y	N	N/A	Y	N		
73	ABC												2403WC	
74	ABC												2403WC	
75	ABC												2403WC	
76	ABC												2403WC	
77	ABC												2403WC	
78	ABC												2403WD	
79	ABC												2403WD	
80	ABC												2403WD	
81	ABC												2403WD	
82	ABC												2403WD	
83	ABC												2403WD	
84	ABC												2403WD	
85	ABC												2403WD	
86	ABC												2403WD	
87	ABC												2403WD	
88	ABC												2403WD	
89	ABC												2403WD	

Operator (print/sign/date/time): **FWS (sign/date):**

* *If current year is six or more years greater than manufactured year, then extinguisher has expired and should be replaced.*

Appendix H - (Cont.) Monthly RCRA CWC Fire Extinguisher Inspection Checklist (Page 6 of 11)

Fire Extinguisher Inspections Page 6 of 11 (Use check mark to indicate condition)

Building Number: Central Waste Complex **Area**: 200W **Month & Year:**

Station Number	Extinguisher Type	Extinguisher in Place		Accessible		Visual Inspection Complete		Gauge Reading Normal			Expiration Year*		Location	Comments
		Y	N	Y	N	Y	N	Y	N	N/A	Y	N		
90	ABC												2403WD	
91	ABC												2403WD	
92	ABC												2403WD	
93	ABC												2403WD	
94	ABC												2403WD	
95	ABC												2403WD	
96	ABC												2403WD	
97	ABC												2403WD	
98	ABC												2403WD	
99	ABC												2403WD	
100	ABC												2403WD	
101	ABC												2403WD	
102	ABC												2403WD	
103	ABC												2403WD	
104	ABC												MO-288 (CWC Trailer)	
105	ABC												FS-1	
106	ABC												FS-2	

Operator (print/sign/date/time): **FWS (sign/date):**

* *If current year is six or more years greater than manufactured year, then extinguisher has expired and should be replaced.*

Appendix H - (Cont.) Monthly RCRA CWC Fire Extinguisher Inspection Checklist (Page 7 of 11)

Fire Extinguisher Inspections Page 7 of 11 (Use check mark to indicate condition)

Building Number: Central Waste Complex **Area:** 200W **Month & Year:**

Station Number	Extinguisher Type	Extinguisher in Place		Accessible		Visual Inspection Complete		Gauge Reading Normal			Expiration Year*		Location	Comments
		Y	N	Y	N	Y	N	Y	N	N/A	Y	N		
111	ABC												FS-6	
114	ABC												FS-9	
116	ABC												FS-11	
121	ABC												FS-15	
123	ABC												FS-16	
124	ABC												FS-17	
128	ABC												FS-19	
129	ABC												FS-20	
22	ABC												FS-22	
24	ABC												FS-24	
125	D												AMW-2	
126	D												AMW-1	
127	D												AMW-3	
128	D												AMW-4	

Operator (print/sign/date/time): **FWS (sign/date):**

* *If current year is six or more years greater than manufactured year, then extinguisher has expired and should be replaced.*

Appendix H - (Cont.) Monthly RCRA CWC Fire Extinguisher Inspection Checklist (Page 8 of 11)

Fire Extinguisher Inspections Page 8 of 11 (Use check mark to indicate condition)

Building Number: Central Waste Complex **Area**: 200W **Month & Year:**

Station Number	Extinguisher Type	Extinguisher in Place		Accessible		Visual Inspection Complete		Gauge Reading Normal			Expiration Year*		Location	Comments
		Y	N	Y	N	Y	N	Y	N	N/A	Y	N		
130	D												AMSM-1	
131	D												AMSM-3	
132	D												AMSM-5	
133	D												AMSM-7	
134	D												AMSM-8	
135	D												AMSM-6	
136	D												AMSM-4	
137	D												AMSM-2	
138	ABC												2404WA (North door)	
139	ABC												2404WA (South door)	
140	ABC												2404WA (East door)	
141	ABC												2404WA (West door)	

Operator (print/sign/date/time): **FWS (sign/date):**

* *If current year is six or more years greater than manufactured year, then extinguisher has expired and should be replaced.*

Appendix H - (Cont.) Monthly RCRA CWC Fire Extinguisher Inspection Checklist (Page 9 of 11)

Fire Extinguisher Inspections Page 9 of 11 (Use check mark to indicate condition)

Building Number: Central Waste Complex **Area**: 200W **Month & Year:**

Station Number	Extinguisher Type	Extinguisher in Place		Accessible		Visual Inspection Complete		Gauge Reading Normal			Expiration Year*		Location	Comments
		Y	N	Y	N	Y	N	Y	N	N/A	Y	N		
2	ABC												2120WA (North door)	
1	ABC												2120WA (South door)	
4	ABC												2120WB (North door)	
3	ABC												2120WB (South door)	
1	ABC												Step-off Pad Shack (MO-2164)	
1	ABC												MO-437, West Door	
2	ABC												MO-437, South Door	
1	ABC												MO-438, Southwest Door	
2	ABC												MO-438, Southeast Door	
1	ABC												MO-743, East Door (sign shop)	
2	ABC												MO-743, South Door	
3	ABC												MO-743, Connex (satellite area)	
4	ABC												MO-743, North Door	
5	ABC												MO-743, Fuel Caddy Storage	

Operator (print/sign/date/time): **FWS (sign/date):**

* *If current year is six or more years greater than manufactured year, then extinguisher has expired and should be replaced.*

Appendix H - (Cont.) Monthly RCRA CWC Fire Extinguisher Inspection Checklist (Page 10 of 11)

Fire Extinguisher Inspections Page 10 of 11 (Use check mark to indicate condition)

Building Number: Central Waste Complex **Area**: 200W **Month & Year:**

Station Number	Extinguisher Type	Extinguisher in Place		Accessible		Visual Inspection Complete		Gauge Reading Normal			Expiration Year*		Location	Comments
		Y	N	Y	N	Y	N	Y	N	N/A	Y	N		
1	ABC												MO-720, West wall (South end)	
2	ABC												MO-720, South wall	
3	ABC												MO-720, East wall outside lunchroom	
4	ABC												MO-720, North wall	
5	ABC												MO-720, West wall (North end)	
1	ABC												MO-721, East wall (North door)	
2	ABC												MO-721, East wall (lunchroom)	
13	ABC												MO-289, South wall	
14	ABC												MO-289, Gas storage area	
1A	D												2727W, South	
1	ABC												2727W, South	
2A	D												2727W, North	
2	ABC												2727W, North	
1	ABC												2420W	
1	ABC												MO-614, East end	
2	ABC												MO-614, West end	
1	ABC												MO-616, East door	
2	ABC												MO-616, South door	

Operator (print/sign/date/time): **FWS (sign/date):**

* *If current year is six or more years greater than manufactured year, then extinguisher has expired and should be replaced.*

Appendix H - (Cont.) Monthly RCRA CWC Fire Extinguisher Inspection Checklist (Page 11 of 11)

NOTE: *This inspection sheet is intentionally left blank for recording miscellaneous inspection items.*

Fire Extinguisher Inspections Page 11 of 11 (Use check mark to indicate condition)

Building Number: Central Waste Complex **Area:** 200W **Month & Year:**

Station Number	Extinguisher Type	Extinguisher in Place		Accessible		Visual Inspection Complete		Gauge Reading Normal			Expiration Year*		Location	Comments
		Y	N	Y	N	Y	N	Y	N	N/A	Y	N		

Operator (print/sign/date/time): **FWS (sign/date):**

* *If current year is six or more years greater than manufactured year, then extinguisher has expired and should be replaced.*

Appendix I - Monthly/Quarterly RCRA CWC Spill Kit Inventory Checklist

Month:	
Inspection: ☐ Monthly ☐ Quarterly (The quarterly inspection, January, April, July and October, is completed in conjunction with the monthly inspection using this form.)	
Self-contained Spill Kits/Spill Drum Kits (check inspection locations):	
☐ 2401-W (Outside Storage Building Southwest Corner) ☐ 2402-W (Along Center Roadway) ☐ 2402-WL (Along Center Roadway) ☐ 2403-WA (Outside East Entrance)	☐ 2404-WA ☐ Waste Receiving & Staging Area ☐ 2402-WD (Drum Kit Near) ☐ 2402-WH (Drum Kit Near) ☐ Other:
Seal is Intact/Initialed/Dated (check one): ☐ **Yes** ☐ **No**	
Item/Quantity (Complete this section only if the above answer is "No")	**Inventory Check**
Dam Kits/Absorbent Socks (2)	
Absorbent (2, 25 lb)	
Wide, Flat-end Non-sparking Shovels (2)	
Face Shields (2)	
Radiation Rope (50 ft)	
Radiological Signs (4)	
Chemical Resistant Gloves (2 pair)	
Additional tools/supplies may be obtained as needed.	
Quarterly Inspection (Complete this section for Quarterly Surveillance)	**Check**
Open Spill Kit	
Clean & Inspect for Deterioration	
Replace Spill Kit Equipment, as necessary	
Reseal Spill Kit	
Quarterly Inspection Complete	
Comments:	
Operator (print/sign/date/time):	
FWS (print/sign/date):	

Appendix J - Monthly CWC First Aid Kit & Personal Particulate Eyewash Bottle Checklist

Assigned Facility: CWC			Month:		
First Aid Kit			**Blood Borne Kit**		
Location	**Number**	**Seal Intact (circle one)**	**Location**	**Number**	**Seal Intact (circle one)**
MO-720	1	Yes No	MO-720	1A	Yes No
MO-721	3	Yes No	MO-721	3A	Yes No
MO-437	S1	Yes No	MO-437	S1A	Yes No
MO-438	S2	Yes No	MO-438	2A	Yes No
MO-743 (north end)	5	Yes No	MO-743	5A	Yes No
MO-288	1	Yes No	MO-288	2	Yes No
EP Trailer (HO-64-07016)	1	Yes No	EP Trailer (HO-64-07016)	1	Yes No
EP Trailer (HO-64-07040)	1	Yes No	EP Trailer (HO-64-07040)	1	Yes No
Comments:					

Personal Particulate Eyewash Bottle Location	Seal Intact (circle one)	Expiration Date	Personal Particulate Eyewash Bottle Location	Seal Intact (circle one)	Expiration Date
2402-W Fire Riser Room	Yes No		2403-WA Fire Riser Room	Yes No	
2402-WB Fire Riser Room	Yes No		2403-WB Fire Riser Room	Yes No	
2402-WC Fire Riser Room	Yes No		2403-WC Fire Riser Room	Yes No	
2402-WD Fire Riser Room	Yes No		2403-WD Fire Riser Room	Yes No	
2402-WE Fire Riser Room	Yes No		2403-WD Fire Riser Room	Yes No	
2402-WF Fire Riser Room	Yes No		2404-WA Fire Riser Room	Yes No	
2402-WG Fire Riser Room	Yes No		MO-743 Near Rollup Door	Yes No	
2402-WH Fire Riser Room	Yes No		MO-288 South Wall	Yes No	
2402-WI Fire Riser Room	Yes No				
2402-WJ Fire Riser Room	Yes No		MO-721 East wall	Yes No	
2402-WK Fire Riser Room	Yes No		MO-720	Yes No	
2402-WL Fire Riser Room	Yes No		MO-437	Yes No	
EP Trailer (HO-64-07016)	Yes No		MO-438	Yes No	
EP Trailer (HO-64-07040)	Yes No				
Comments:					

Operator (print/sign/date/time):

FWS (print/sign/date):

Appendix K - Monthly Non-RCRA CWC Telephone & Windsock Inspection Checklist

CWC Telephone Inspection		
Number	**Location**	**Operating Properly?** (circle one)
373-5750	2403-WA	Yes No
373-5477	2403-WB	Yes No
373-5621	2403-WC	Yes No
373-5553	2403-WD	Yes No
372-2861	2404-WA	Yes No
373-5688	Waste Receiving & Staging Area	Yes No
Comments:		

CWC Windsock Inspection	
Location	**Results** (circle one)
SE of MO-288	Sat Unsat
NW of Low Flash Point Mod	Sat Unsat
NE of 2402-WL	Sat Unsat
West of 2403-WA & North of Expansion Area	Sat Unsat
Gate 6A Expansion Area	Sat Unsat
SW of 2727-W	Sat Unsat
North of Mixed Waste Storage Pad	Sat Unsat
MO-720 Staging Area	Sat Unsat
Comments:	
Operator (print/sign/date/time):	
FWS (print/sign/date):	

Appendix L - Weekly/Quarterly RCRA Emergency Response Trailer Inventory Checklist

Location:			
Seal Intact/Initialed/Dated (circle one): Yes No			
Item/Quantity	**Check**	**Item/Quantity**	**Check**
Flow Checker - 2		Disposable Coveralls - > 12 (each size)	
Hand Sanitizer - 2		Laundry Bags - 3	
		Step Off Pads - 4	
		Dam Kit (PIGS) - 1	
		Universal Absorbent Pad - 1 Box	
FOS/RHA - Bag		Nitrile/Latex Gloves - 2 Boxes (each size)	
		Canvas Gloves - 12 pair	
Box Knives - > 5		Disposable Boots - > 20	
Scissors - > 4		Disposable Hoods - > 12	
		Arm Sleeves - > 30	
Caution Tape - 1 Roll		Plastic Bags (clear) - 1 Box Small	
Danger Tape - 1 Roll		Plastic Bags (clear) - 1 Box Large	
		Plastic Bags (yellow) - 1 Roll	
Hearing, Ear Plugs - 1 Box		Rubber Matting - 1 Roll	
Hearing, Muff - 3		Radiation Signs (ARA) - 6	
Goggles - > 6		Radiation Signs (CA) - 6	
Dust Masks - > 6		Radiation Signs (HRA) - 6	
Safety Glasses - > 6		Radiation Signs (RBA) - 6	
Sprayer - 2		Rubber Boots (XL) - 3	
20 ft Wide Plastic Sheeting - 1 Roll		Rubber Boots (3XL) - 2	
Barrier Chain (yellow) 5 gal - 1		Rubber Shoes (M/L) - 6	
Masking Tape - > 6		Rubber Shoes (XL) - > 12	
Duct Tape - > 4		Rubber Shoes (3XL) - > 12	
First Aid Kit - 1		Rags - 1 Bags	
Blood Borne Pathogen Kit - 1		PAPR Belts - 3	
		PAPR Hood Bands - 4	
Hamper - 2		Blue Coveralls (various sizes) - 6	
Do Not Enter Signs - 4		Stantions - 6	
Generator (3,000 Watt) - 2/ Fuel Level Check		Plastic Radiation Chain (5 gal) - 3	
Class A Expiration Date is Current		Extension Cords (50 ft) - 2	
Class B Expiration Date is Current		Soil Cement (5 gal) - 1	
		Water (5 gal) - 1	
Quarterly Shelf Life			
Nitrile/Latex Gloves		Masking Tape	
First Aid Burn Kit		Eye Wash	
Silver Shield Gloves - 3 pair each size (M, L, XL)			
Comments:			
Operator (print/sign/date/time):			
FWS (print/sign/date):			

Appendix M - Monthly Non-RCRA AED Inspection Checklist

Location of Automated External Defibrillator (AED)	Does Status Indicator Change to red then back to Green When Lid is Opened (circle one)		Are Voice Prompts Confirmed When Lid is Opened? (circle one)		Are AED Pads, Battery, & Installed Electrodes Expiration Date >2 Months? (circle one)		Is Supply Inventory Complete? (circle one)	
MO-721: Lunchroom, North wall	Yes	No	Yes	No	Yes	No	Yes	No
MO-288: South wall	Yes	No	Yes	No	Yes	No	Yes	No
MO-438: Lunchroom, East wall	Yes	No	Yes	No	Yes	No	Yes	No
MO-720: West corridor, on wall just North of main entrance	Yes	No	Yes	No	Yes	No	Yes	No
MO-743: South end of hallway, East wall	Yes	No	Yes	No	Yes	No	Yes	No
MO-281: Foyer at East entrance	Yes	No	Yes	No	Yes	No	Yes	No
MO-287: Foyer at East entrance (white cabinet)	Yes	No	Yes	No	Yes	No	Yes	No

Comments:

Operator (print/sign/date/time):

FWS (print/sign/date):

Appendix N - CWC End of Workday Security Checklist

Yes	No	N/A	Checklist Items
			Buildings - doors are closed and locked.
			For 2404-WA Drum Storage Area Lighting only - lamps are off.
			Gates - closed and locked.
			No obvious hazards (i.e., fire, flooding, leaks, spills, ice, snow).
			Facility secured/locked and dispatch notified.

Comments:

Operator (print/sign/date/time):

FWS (print/sign/date):

Appendix O - Monthly CWC SAA(s) Inspections Checklist

Location: SAA

Container Number(s):

Inspection Items	Circle One
1. Is accumulation area at or near point of generation?	Yes No N/A
2. Is area controlled or locked/ or is container locked?	Yes No N/A
3. Are containers closed except when adding or removing waste?	Yes No N/A
4. Are containers in good condition (not deteriorated, badly rusted, bulging, or dented)?	Yes No N/A
5. Is area free of any evidence of leaks?	Yes No N/A
6. Is container marked as "hazardous waste" or "dangerous waste"?	Yes No N/A
7. Are major risk(s) clearly identified on each container?	Yes No N/A
8. Are labels and markings facing outward and in good condition?	Yes No N/A
9. From inventory Checklist, is there less than 55 gallons of dangerous waste or 1 quart of acutely hazardous waste per waste stream?	Yes No N/A
10. Are containers holding flammable liquids properly grounded?	Yes No N/A
11. Is there secondary containment for liquid wastes?	Yes No N/A
12. Is housekeeping satisfactory (containers in dry location, no trash or debris area maintained in an orderly condition, no uncontainerized dangerous waste, etc.)?	Yes No N/A

Comments:

Operator (print/sign/date/time):

FWS (print/sign/date):

NOTE: *See Operator Aid, CWC/LLBG-OPA-001, for location of containers to be inspected.*

Appendix P - Monthly Combustible Loading Surveillance Checklist [TSR 5.7.1.a]

Key Assumption	#	Criteria	Check	
			Yes	No
SWOC Key 1.3.1.4	1	Are any NFPA Containers stored in buildings other than 2404WA or a LFPM? *Note: NFPA Containers may be stored in other buildings if limitation requirements in Step 2.2.17 are met. Location and number of NFPA Containers per building can be found in the latest Crystal Report titled "Total DE-Ci for CWC Buildings."*		
CWC Key 1.3.2.1, 2, 10, & 11	2	Are there any combustible containers stored inside the building? *Note: Building 2404WA may store up to 10 wooden boxes, under certain conditions.*		
SWOC Key 1.3.1.11	3	Are there any drums stacked higher than 3 tiers?		
SWOC Key 1.3.1.12	4	Are there any 3rd tier drums not banded?		
SWOC Key 1.3.1.9	5	Are there any containers coated with polyurea not on metal pallets?		
SWOC Key 1.3.1.10	6	Are there any drums stored on the 2nd or 3rd tier not on pallets?		
SWOC Key 1.3.1.14	7	Are there any wooden boxes stored outside less than ____ ft from any building?		
		1) 31 ft if box is ≥ 6 ft tall		
		2) 35 ft if box is ≥ 8 ft tall		
		3) 66 ft if box is ≥ 11 ft tall		
		4) 71 ft if box is ≥ 13 ft tall		

Comments:

Operator (print/sign/date/time):

FWS (print/sign/date):

The SDO is to be notified of any answer that is "Yes."

Appendix Q - Criteria for Entry in the Abnormal Container Management Program

Containers meeting the following category and criteria must be entered into the ACMP. Both the category and criteria must be evaluated in making ACMP determinations.

	Category	Criteria
1	Indications of bulging **[TSR 5.6.4.b&d]** **[TSR 5.7.8]**	A bulged lid interferes with a straight edge laid across the top. The straight edge should span the diameter of the drum. The side wall is bulged, as determined visually. Rocking when setting on flat surface indicative of a raised section center region of bottom surface.
2	Damaged or corroded (degraded) containers. **[TSR 5.6.4.e]** **[TSR 5.7.8]**	Damaged or corroded (degraded) containers that cannot be safely handled using approved operating methods and/or procedures without a likely spread of contamination.
3	Non-standard containers stored outside **[TSR 5.7.8]**	A waste container (waste stream) stored outside for which no defined path forward to storage or disposal currently exists.
4	Containers with unknown contents **[TSR 5.7.8]**	Information is obtained that causes the characterization to be questioned and a technical evaluation determines that insufficient information is available to assure proper management of the container (e.g., ignitable, corrosive, explosive, or incompatible contents).
		For the Waste Retrieval Project: Container is not identifiable by PIN/CIN, seal number, and does not meet the physical descriptions identified in the records or cannot be tied to acceptable knowledge of a waste lot or waste stream.
5	Unvented containers discovered at or proposed for transfer to CWC, WRAP, or T Plant that require venting **[TSR 5.7.8]**	A technical evaluation determines venting is required. Examples include: LLW and TRU boxes that do not have an established vent path or contain a multi-piece gasket, or Containers that have completed the retrieval process, been released for unrestricted movement and processing, and subsequently determined to be unvented.
6	Unvented, non-drum containers identified in the LLBG that require venting. **[TSR 5.7.8]**	A technical evaluation determines venting is required (e.g., boxes that do not have an established vent path or contain a multi-piece gasket). Unvented waste container which requires venting, other than 55-gal drums.
7	Container exceeds the LFL. **[TSR 5.7.8]**	After released for unrestricted movement abatement, the hydrogen concentration is determined to be greater than 5% or the concentration of other flammable gases are greater than the LFL.
8	Waste containers that do not fully meet the waste acceptance criteria (HNF-EP-0063) **[TSR 5.7.8]** **[TSR 5.7.9.c]**	Waste containers that do not fully meet the waste acceptance criteria (HNF-EP-0063), that is, the waste container discrepancy cannot be resolved using normal operating procedures or involves one of the preceding ACMP entry criteria.

SW-040-043 (SWSD-PRO-OP-51714), Appendix A - Weekly CWC RCRA/Non-RCRA Inspection Checklist for 2402WH, Dated 01/28/2014

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Appendix A - Weekly CWC RCRA/Non-RCRA Inspection Checklists

Location/Facility/Module: 2402WH

#	Yes	No	N/A	Weekly CWC RCRA Checklist Area Inspection
1	✓			Containment curbing and flooring is free of scratches that penetrate to the concrete, cracks, or gaps and is sufficiently impervious to contain leaks, spills, and accumulated rainfall?
2	✓			Area is generally dry and free of accumulated water. There is no standing and/or unexpected water or snow accumulation in or around area?
3	✓			Areas where dangerous waste may be accumulated have "Danger – Unauthorized Personnel Keep Out" (or an equivalent legend) and "No Smoking" signs posted?
4	✓			Postings are accurate, intact, visible, legible and in good condition?
5	✓			Secondary containment system is free of liquid? If "No", notify FWS and go to SW-080-003.
#	**Yes**	**No**	**N/A**	**Container Inspection**
6	✓			Container integrity is not compromised by punctures, dents, penetrating scratches, loose lids, bulging, excessive corrosion or other physical damage/deterioration. **[TSR 5.6.4.b]**
7	✓			Containers are closed, are stored in a manner which will not rupture the containers or cause them to leak, and show no evidence of spillage or leakage, such as moisture on the sides or underneath?
8	✓			Container top does not have excessive buildup of dirt/debris that would possibly interfere with the proper operation of the drum's ventilation system (such as, clogging of NucFils).
9	✓			Container marking/labeling is intact, unobscured, legible and in good condition?
10	✓			Dangerous/hazardous waste containers are marked as "hazardous" or "dangerous" and have major risk label, as applicable?
11	✓			Aisle space between rows of containers appears to be at least 36 inches? **[FHA SWOC Key 1.3.1.13][FHA Key #10]**
12	✓			Containers are stored in rows no more than 2 wide?
13	✓			Containers are elevated (palletized)?
				Weekly CWC Non-RCRA Checklist
#	**Yes**	**No**	**N/A**	**Area Inspected/Description of Non-RCRA Items**
14	✓			Chain barricades around area are intact and in good condition?
15	✓			Lighting is adequate to complete inspection (where applicable)?
16	✓			Areas in and around waste stored in the facilities/modules are free of combustibles such as tumbleweeds, paper, rags, trash, empty wood pallets, etc.? **[TSR 5.7.1.b&c][TSR 5.6.4.h]**
17	✓			Roadways are clear and unobstructed. Fire fighting vehicles have free and easy access to the area. Exits are clear and unobstructed?
18	✓			PCB label at facilities/modules entrances are intact, unobscured, legible and in good condition (where applicable)?
19	✓			Pallet condition is adequate to ensure module stability.
20	✓			Aisle space between rows of containers appears to be at least 36 inches? **[FHA SWOC Key 1.3.1.13][FHA Key #10]**
21			✓	Waste containers staged or stored outside are no higher than 2 tiers. **[TSR 5.6.4.a]**
22			✓	Space between inside waste array zones is > 12 ft (for inside zones) or > 33 ft (for outside zones) and free of combustibles. **[TSR 5.6.4.g & h]**
23			✓	Third-tier drums are banded horizontally with metal band (single drum banded to pallet) **[TSR 5.6.4.a]**

Comments: open item #13-004, 13-007

Operator (print/sign/date/time): JR Lowery [signature] 1/28/14 0850

FWS (print/sign/date/time): Dwayne Bilman [signature] 1/28/14 1507 DC

NOTE: ***All RCRA "No" or "N/A" data points are required to have an explanation in the Comments section of the inspection sheet. An explanation for non-RCRA "No" or "N/A" data points is not required.***

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SW-040-043 (SWSD-PRO-OP-51714), Appendix A - Weekly CWC RCRA/Non-RCRA Inspection Checklist for 2402WH, Dated 05/08/2013

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Appendix A - Weekly CWC RCRA/Non-RCRA Inspection Checklists

Location/Facility/Module: 2402 WH

Weekly CWC RCRA Checklist

#	Yes	No	N/A	Area Inspection
1		①		Containment curbing and flooring is free of scratches that penetrate to the concrete, cracks, or gaps and is sufficiently impervious to contain leaks, spills, and accumulated rainfall?
2	✓			Area is generally dry and free of accumulated water. There is no standing and/or unexpected water or snow accumulation in or around area?
3	✓			Areas where dangerous waste may be accumulated have "Danger – Unauthorized Personnel Keep Out" (or an equivalent legend) and "No Smoking" signs posted?
4	✓			Postings are accurate, intact, visible, legible and in good condition?
5	✓			Secondary containment system is free of liquid? If "No", notify FWS and go to SW-080-003.
#	**Yes**	**No**	**N/A**	**Container Inspection**
6	✓			Container integrity is not compromised by punctures, dents, penetrating scratches, loose lids, bulging, excessive corrosion or other physical damage/deterioration. **[TSR 5.6.4.b]**
7	✓			Containers are closed, are stored in a manner which will not rupture the containers or cause them to leak, and show no evidence of spillage or leakage, such as moisture on the sides or underneath?
8	✓			Container top does not have excessive buildup of dirt/debris that would possibly interfere with the proper operation of the drum's ventilation system (such as, clogging of NucFils).
9	✓			Container marking/labeling is intact, unobscured, legible and in good condition?
10	✓			Dangerous/hazardous waste containers are marked as "hazardous" or "dangerous" and have major risk label, as applicable?
11	✓			Aisle space between rows of containers appears to be at least 36 inches? **[FHA SWOC Key 1.3.1.13][FHA Key #10]**
12	✓			Containers are stored in rows no more than 2 wide?
13	✓			Containers are elevated (palletized)?

Weekly CWC Non-RCRA Checklist

#	Yes	No	N/A	Area Inspected/Description of Non-RCRA Items
14	✓			Chain barricades around area are intact and in good condition?
15	✓			Lighting is adequate to complete inspection (where applicable)?
16	✓			Areas in and around waste stored in the facilities/modules are free of combustibles such as tumbleweeds, paper, rags, trash, empty wood pallets, etc.? **[TSR 5.7.1.b&c][TSR 5.6.4.h]**
17	✓			Roadways are clear and unobstructed. Fire fighting vehicles have free and easy access to the area. Exits are clear and unobstructed?
18	✓			PCB label at facilities/modules entrances are intact, unobscured, legible and in good condition (where applicable)?
19	✓			Pallet condition is adequate to ensure module stability.
20	✓			Aisle space between rows of containers appears to be at least 36 inches? **[FHA SWOC Key 1.3.1.13][FHA Key #10]**
21			✓	Waste containers staged or stored outside are no higher than 2 tiers. **[TSR 5.6.4.a]**
22			✓	Space between inside waste array zones is > 12 ft and free of combustibles. **[TSR 5.6.4.g]**
23			✓	Third-tier drums are banded horizontally with metal band (single drum banded to pallet) **[TSR 5.6.4.a]**

Comments: ① Scratches Penetrate Concrete by Survey Marker 83,55
① SDD comment, placed on RCRA open item list 13-004. [illegible]

Operator (print/sign/date/time): Richard A Montux Richard A Montux 05/08/2013 0940
FWS (print/sign/date/time): Jeff Cowley [illegible] 5/8/2013 1120 ASM

NOTE: ***All RCRA "No" or "N/A" data points are required to have an explanation in the Comments section of the inspection sheet. An explanation for non-RCRA "No" or "N/A" data points is not required.***

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RCRA Open Item List Report – CWC, Dated 04/21/2014

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4/21/2014

RCRA Open Item List Report - CWC

Log	Bldg/Item#	Discovered Date	Initiator	Description	Status	Open/ Closed
R-11-012	2402W	2/3/2011	M. Kiehn	Yellow paint near fire riser room and roll up door is bubbling	Painter needed to patch floor.	Open
R-09-036	2403WA	7/1/2009	S. Hubbard	NE Corner 4 wall has been damaged and left a open gap to outside	JCS work request 274404 initiated to evaluate and repair. Work request validated, work package 2X-11-02104 in planning (3/16/11).	Open
R-11-032	2403WB	6/2/2011	C. Sarmiento D CLeavenger	Sealant on floor seams in 2403WB is cracked and scratched, needs repairs	See Open Item 11-025. After seams are successfully repaired in 2403WD, 2403WB floor seams and scratches will be repaired. Added scratches to Open Item 6/13/13	Open
R-11-025	2403WD	5/5/2011	M. Kiehn	Sealant on floor seams in 2403WD is badly cracked and scratched, need to be repaired	Maintenance is procuring a test patch kit to do a test repair to a section of floor seam. 5/17/11 Work package 2X-11-4018 initiated to do the test and repairs. 6/1/11Repair job walkdown performed by multi-craft team including operations, painters, ECO, radcon. 7/11/11 Work Package 2X-11-4018 is ready to be worked scheduled for work. 8/10/11 Work started on floor seams in 2403WD.	Open
R-09-025	2404WA	5/11/2009	C. Faith	Floor perimeter seam is separating in several locations, needs to be resealed	JSC Work request 247405 initiated to evaluate and repair. Work request validated, work package 2X-11-02105 in planning (3/16/11) Work now be performed under package 2X-11-4018. Package ready to be scheduled for work. (7/11/11)	Open

4/21/2014

RCRA Open Item List Report - CWC

Log	Bldg/Item#	Discovered Date	Initiator	Description	Status	Open/ Closed
R-11-004	AMW	1/18/2011	M. Kiehn	East explosion blow out panel on AMW-4 needs to be repaired	Engineering and operations need to evaluate if AMW-4 is still needed for waste storage and repair if it is.	Open
R-11-011	AMW	1/31/2011	M. Kiehn	East explosion blow out panel on AMW-3 needs to be repaired	Engineering and operations need to evaluate if AMW-3 is still needed for waste storage and repair if it is.	Open
R-10-007	LFSM	9/22/2010	M. Kiehn	FS07 door warped - hard to close	JCS work request 246291 submitted 2/8/11. Work request validated; JCS work package 2X-11-01016 initiated 2/9/11.	Open
R-13-001	2403WA	2/27/2013	R. Monlux D Cleavenger	Cracks in floor in Q3 and Q4, Floor perimeter seam is separating in several locations, needs to be resealed. Base of columns have crack that go to the concrete.	Generate a work request to repair identified issues. Added Q3 crack to Open Item 6/13/13	Open
R-13-002	2403WC	3/6/2013	J. Todd	Floor perimeter seam is separating in several locations, needs to be resealed	Generate a work request to repair identified issues	Open
R-13-003	2402WG	4/22/2013	J. Todd	Crack on East Wall in needs to be repaired	Engineering walked down, evaluating repairs.	Open
R-13-004	2401W, 2402WK, 2042WE, 2402WF 2402WH 2402WJ 2402WL 2403WD	05/6,7,8,9/ 2013	R. Monlux	Cracks and scratches have been noted in the flooring in the listed bldgs.	Engineering and Ops and ECO have walked down. Evaluating the extent of repairs and to schedule resources to facilitate repairs.	Open
R-13-005	SA2	5/6/1013	R. Monlux	Significant repairs required to SA2 in order to stage waste	ECO is evaluating permit. Operations considers SA2 out of service. No plans to store waste.	Open

4/21/2014

RCRA Open Item List Report - CWC

Log	Bldg/Item#	Discovered Date	Initiator	Description	Status	Open/ Closed
R-13-006	2403WC	5/9/2013	P. Carter	Scratches in floor in Q1	Engineering and Ops and ECO have walked down. Evaluating the extent of repairs and to schedule resources to facilitate repairs.	Open
R-13-007	2402WH	10/16/2013	R. Lowery	West Wall - Gap between metal siding and concrete berm approx. 18" long	Schedule repairs to west side of Building.	Open

FWS Review: _____ _____ _____

Print Sign Date

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SWSD-PRO-OP-52802, Management of the List of SWOC Containers with a Higher Potential for Corrosion (Watch List), Revision 0, Change 0, Dated 03/06/2014

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One Team. One Culture.

Administrative Procedure

SWSD-PRO-OP-52802

Management Of The List of SWOC Containers With A Higher Potential For Corrosion (Watch List)

Revision 0, Change 0

Published: 03/06/2014
Effective: 03/06/2014

Project: DWF&RS-Decommissioning Waste Fuels & Remediation Services
Topic: Operations

Technical Authority: Bannister, Roland
Functional Manager: Mortensen, Alan

Use Type: Administrative

JHA: Administrative
Periodic Review Due Date: 03/06/2019
Rev. 0, Chg. 0
USQ Screen Number:

- Solid Waste Operations Complex : **Screening Determination Performed:** SWOC-14-027
  Screener: Jacobs, Orvil

CHANGE SUMMARY

Description of Change

This procedure describes the process for entry and maintenance of the "SWOC Containers with a Higher Potential for Corrosion" list, commonly referred to as the "Watch List".

CR-2013-2978

Management Of The List of SWOC Containers With A Higher Potential For Corrosion (Watch List)

Published Date: 03/06/2014 **Effective Date: 03/06/2014**

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1.0 INTRODUCTION

1.1 Purpose

This procedure describes the process for entry and maintenance of the "SWOC Containers with a Higher Potential for Corrosion" list, commonly referred to as the "Watch List". This is the list of Containers stored in the Solid Waste Operations Complex (SWOC) that have been identified as requiring enhanced inspections. The current list is located in the Solid Waste Information and Tracking System (SWITS) as described in Appendix B.

The Discrepant Container Management Program (DCMP) and Abnormal Container Management Program (ACMP) both afford greater attention to containers that may present an elevated risk, but due to their specific focus areas neither identify the entire inventory of containers that may become a problem within a 3 to 12 month timeframe. For instance, both programs address severe rusting or apparent structural defects, but not a change in corrosion that may be an indicator of future degradation.

This procedure is to be read in conjunction with PRC-PRO-NS-52318, *SWOC Abnormal Container Management Program,* and PRC-PRO-EP-52328, *SWOC Discrepant Container Management Program.* Both programs are unaffected by the requirements of this document; this procedure is an additional tool in recognizing "at risk" containers.

1.2 Scope

This procedure applies to personnel involved in the entry and maintenance of the "SWOC Containers with a Higher Potential for Corrosion" list.

1.3 Applicability

Solid Waste Operations Complex (SWOC) operations personnel use the Watch List to track identified containers while performing inspections and surveillances.

1.4 Implementation

This procedure is affective upon publication.

2.0 RESPONSIBILITIES

All responsibilities associated with this procedure are identified in the process steps.

3.0 PROCESS

3.1 Initial Actions for Placement of a Container on the Watch List

NOTE:

- *Assessment of whether a container should be entered into either the ACMP or DCMP occurs independently of this procedure and before placement of a container onto the Watch List.*
- *Criteria for inclusion of containers on the Watch List are provided in Appendix A. There are 3 ways a container can be identified for inclusion on the list.*

Actionee	Step	Action
NOTE:		• *Project personnel may recommend inclusion of a container on the Watch List to the Shift Duty Officer (SDO). This recommendation may be developed via observation in the field, additional Acceptable Knowledge (AK) research or new/additional Process Knowledge (PK).* • *The Priority, or category, indicating the attention a particular container should receive is determined through agreement between the SDO, Facility Management, and the Transuranic (TRU) Waste Subject Matter Expert (SME) (or designee). Descriptions of the Priorities are included in Appendix C.*
SDO		1. IF identification of corrosion on a container meets Criteria 1 in Appendix A, THEN DIRECT TRU Waste SME (or designee) in writing (email) to place container on the Watch List. 2. IF notification of a container meeting, or having the potential to meet Criteria 2 and/or 3 in Appendix A, THEN CONSULT with Facility Management and the TRU Waste SME (or designee) to determine whether the container should be placed on the Watch List. a. IF it is deemed that the container should be on the Watch List, THEN DIRECT the TRU Waste SME accordingly, in writing. 3. Once a container is determined to meet criteria per Appendix A, THEN ENSURE Watch List label is affixed to container, which includes the date and container number.

3.2 Placement of Containers on the Watch List

Actionee	*Step*	*Action*

NOTE: *Placement of containers on the Watch List is done via input into the TRU Electronic Data Management Tool (TRUEDMT). "Write" access to TRUEDMT is limited and controlled by the TRU Waste SME.*

TRU Waste SME (or designee)

1. OPEN TRUEDMT.
2. CLICK "TRUEDMT" top left corner of screen. (a drop down menu will appear)
3. SELECT "Containers". (this will generate "Choose a Container" screen)
4. ENTER container PIN# in the "Container # starts with" field.
5. ENSURE check marks in the "Active", "Shipped", and "On Hold" fields are gray.
6. CLICK on "Refresh".
7. ENSURE the correct PIN# is displayed in "Container #".
8. CLICK on "Open". (this will open the container data screen in the "General" tab)
9. CLICK on "Edit". (this will enable the "Project" field to be edited)
10. SELECT "Higher Potential for Corrosion" from the drop down menu in the "Project" field.
11. SELECT "Quickscans & Inspections" tab.
12. SELECT "Preinspections".
13. WRITE in the "Inspection Date". This should be the date of discovery.
14. WRITE descriptive comments in the "Comments" field. These should include:
    a. Date of discovery.
    b. Reason container is being placed on the Watch List.
    c. The letters "RJB" if corrosion was found on the container. This will cause the "Corrosion Observed" field in the Watch List to be populated with "YES".

Actionee	*Step*	*Action*
		d. "Priority 1", "Priority 2", or "Priority 3" as agreed with the SDO.
		e. Container Identification Number of the container being overpacked (if applicable).
	15.	CLICK on "Save" at the top of the screen.
	16.	CLICK on "Closed" to return to the "Choose a Container" screen.
	17.	CONFIRM in writing to the SDO that the container has been added to the Watch List.

3.3 Tracking of Containers on the Watch List

Actionee	*Step*	*Action*
SDO	1.	REVIEW the Watch List (See Appendix B) to ensure all identified containers are represented and that the assigned Priority for each container is current.
	2.	ENSURE all containers on the Watch List have completed labels affixed AND COMMUNICATE changes in the Watch List to Facility Operations personnel.
	3.	WHEN Watch List containers are overpacked, NOTIFY TRU Waste SME, in writing.
		a. INCLUDE New Container Overpack number.
	4.	ENSURE containers are retained on the list when they are overpacked. (Container will be retained on the list as an "INNER PACKAGE")
	5.	EVALUATE collocation and segregation of containers on the Watch List.

NOTE: *Overpack of containers will cause the inner container to be removed from the list (it is no longer "active" in TRUEDMT); the new overpack will need to be entered into the list.*

TRU Waste SME (or designee)	6.	ASSIGN "Higher potential for corrosion" project descriptor to the overpack container in TRUEDMT, per sub section 3.2 "Placement of Containers on the Watch List".
	7.	MODIFY TRUEDMT for the overpack container to ensure the Watch List reflects that the container has corrosion and a priority has been assigned in accordance with Appendix C.

3.4 Removal of Containers from the Watch List

NOTE:

- *The process for removal of a container from either the ACMP or DCMP is described in PRC-PRO-NS-52318, SWOC Abnormal Container Management Program, and/or PRC-PRO-EP-52328, SWOC Discrepant Container Management Program. Removal of a container from the Watch List is an action independent of either program.*
- *Containers will be removed from the Watch List as soon as the cause of the degradation to container has been identified and negated.*

Actionee	*Step*	*Action*
Facility Manager	1.	REVIEW actions taken to negate the issue causing, or likely to cause, degradation of the container.
	2.	IF satisfied that the container should be removed from the Watch List, THEN INSTRUCT TRU Waste SME (or designee) accordingly.
	3.	NOTIFY SDO of recommendation to remove container from the Watch List.
TRU Waste SME	4.	OPEN TRUEDMT.
	5.	CLICK "TRUEDMT" top left corner of screen. (a drop down menu will appear.)
	6.	SELECT "Containers" this will generate "Choose a Container" screen.
	7.	ENTER the container PIN# in the "Container # starts with" field.
	8.	ENSURE check marks in the "Active", "Shipped", and "on Hold" fields are all gray.
	9.	CLICK on "Refresh".
	10.	ENSURE the correct PIN# is displayed in "Container #".
	11.	CLICK on "Open". (this will open the container data screen in the "General" tab)
	12.	CLICK on "Edit". (this will enable the "Project" field to be edited)
	13.	REVIEW "Comments" field to see if container was moved to "Higher potential for corrosion" project from another project.
	14.	IF container was moved to "Higher potential for correction" project from another project, THEN TOGGLE "Project" field back to the previous project. This will

be evident in the "Comments" field.

15. IF there is no note of a previous "Project", THEN DELETE "Higher potential for corrosion" from the "Project" field.

16. NOTE removal of "Higher Potential for Corrosion" project in the "Comments" field, AND RECORD the date.

NOTE: *Clicking on Save (step 17) removes the container from the Watch List.*

17. CLICK on "Save" at the top of the screen.

18. CLICK on "Close" to return to the "Choose a Container" screen.

19. CONFIRM in writing to both the Facility Manager and the SDO that the container has been removed from the Watch List.

4.0 FORMS

None.

5.0 RECORD IDENTIFICATION

All records are required to be managed in accordance with PRC-PRO-IRM-10588, *Records Management Processes*. OCRWM records are also managed in accordance with PRC-PRO-QA-19579, *OCRWM Records Management*.

Records Capture Table

Name of Record	Submittal Responsibility	Retention Responsibility	OCRWM Retention Schedule (If OCRWM Related)
Email correspondence between SDO, TRU Waste SME (or designee), and Facility Manager regarding placement, prioritization, overpacking or deletion of containers on/from the Watch List. Confirmation emails are included.	TRU Waste SME	WFMP Records	N/A

6.0 SOURCES

6.1 Commitments

CR-2013-2978

6.2 References

SWSD-PRO-OP-51714, *Inspect CWC & Miscellaneous Buildings*
PRC-PRO-EP-52328, *SWOC Discrepant Container Management Program*
PRC-PRO-NS-52318, *SWOC Abnormal Container Management Program*

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Appendix A - Criteria for Inclusion of Containers on the Watch List

1. Changes in corrosion observed during surveillances, inspections or walkthroughs. These will be brought to the attention of the Shift Duty Officer (SDO) who will direct the placement of the container on the Watch List, if appropriate.

2. Containers are in the same or similar waste streams as those identified in item 1 above and have been discovered via Acceptable Knowledge (AK), Process Knowledge (PK) and/or Non Destructive Examination (NDE) to exhibit the same waste characteristics and configuration.

3. Containers in either the ACMP or the DCMP discovered via AK and/or NDE to exhibit free liquids and/or wet sludge material that are in direct contact with the container wall and base.

Appendix B - Location of Current "Watch List"

1. OPEN the Solid Waste Information and Tracking System (SWITS)
2. SELECT "M008-Reports" from the "SWITS Menu".
3. SELECT "Custom Spreadsheet Reports" from the "M008 Main Reports Menu".
4. CLICK on the "Select Report" button and Select "SWOC Potential Corrosion Cont" report (Report #521).
5. CLICK on the "Generate Spreadsheet" button to obtain an Excel spreadsheet of the information. This can be filtered, sorted and/or saved as required.

Appendix C - Prioritization (Categorization) of Containers on the Watch List

Containers on the Watch List will be placed into 1 of 3 categories. These categories will be based on the timeframe in which management estimates they should be addressed. These categories will be identified as Priority 1, 2, or 3. The Watch List label will state which category (Priority) they are in. Operations Management is responsible for categorizing each container. It will engage the assistance of support groups, particularly Engineering, in this determination.

1. Priority 1 containers will be considered to need remedial action within 30 to 120 days. These will be mined, collocated, and placed in single stack array such that all surfaces can be viewed; the inspection will naturally be enhanced because of ease of access. Newly identified ACMP containers would be placed into this Priority.

2. Priority 2 containers will be considered to need remedial action in 120 – 180 days. These will remain in their current storage location, but will be assessed weekly to determine whether they should be placed into either Priority 1 or 3, or remain as is.

3. Priority 3 containers will be considered to need remedial action in 180 days to 365 days. These will remain in their current storage location, but will be assessed weekly to determine whether they should be placed into either Priority 1 or 2, or remain as is. Priority 1 and 2 containers that are overpacked will be placed into Priority 3 as this is considered to be a temporary solution that is unlikely to prevent further corrosion.

All containers on the Watch List will be viewed on a weekly basis as part of the RCRA inspection. Consequently, the Priority/category will be assessed using a "rolling calendar", rather than fixing remediation dates at the time of discovery. For example, a Priority 2 container may remain a Priority 2 container for a year because the rate of corrosion remains such that it doesn't cause reprioritization into Priority 1.

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Working Schedule, SWOC Repair Schedule, Dated 04/13/2014

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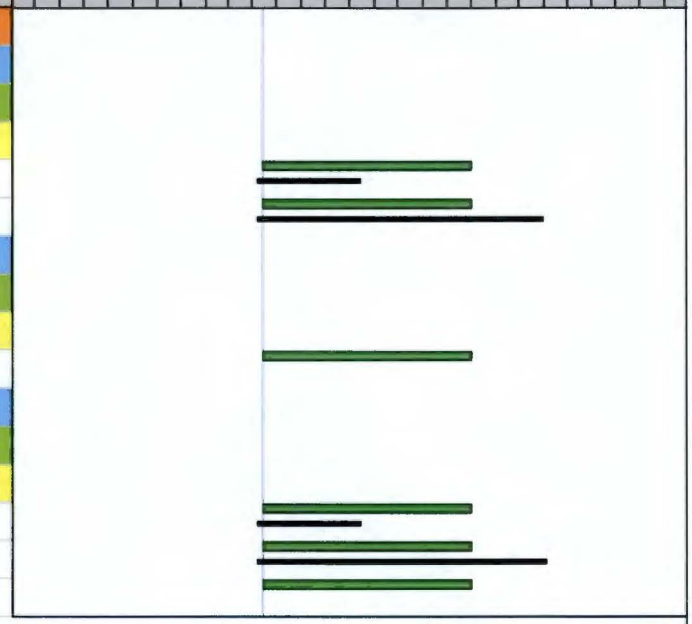
Data Date 13-Apr-14

Working Schedule

Print Date: 16-Apr-14 09:01

Activity ID	Activity Name	Original Duration	%	Start	Finish	BL1 Finish	Variance - BL1 Finish Date	Performing Responsibility	Predecessors	Successors	Notes
RL-013 Solid Waste Stabilization & Disposition											
WRAP Facility Dormant FY14											
WRAP Dormant Activities											
RT10830 WRAP Facility Dormant Activities FY 14											
WR3003	Repair 2404-WB (WI-11-08294) Floor	163	0%	14-Apr-14*	31-Dec-14			CHP - Fulton, T	WR3000		
WR3288	Repair WRAP 2404WB & 2404WC Roof Leaks	163	0%	14-Apr-14*	31-Dec-14			CHP - Fulton, T			
T Plant Min Safe Operations											
T Plant Min Safe											
TP2590 FY14 T-Plant MinSafe Operations - Operations											
TPLBO1010	Repair 214T - Roof Leak	144	0%	14-Apr-14*	31-Dec-14			CHP- Garello, PR			
CWC Min Safe Operations											
CWC Safe & Compliant											
CW2040 FY14 - CWC - Min Safe Operations											
CWC4016	Repair CWC Floors (WP 2X-12-06826)	163	0%	14-Apr-14*	31-Dec-14			CHP- Gilles, D			
CWC4310	Repair CWC Roof Leaks	163	0%	14-Apr-14*	31-Dec-14			CHP- Gilles, D			
CWC4320	Repair CWC Wall	163	0%	14-Apr-14*	31-Dec-14			CHP- Gilles, D			



On track
< 1wk behind
> 1wk behind
Baseline Milestone
Milestone
Actual Work
Milestone Green
Milestone Yellow
M
C
R

Page 1 of 1

FES - RL13 Boone Extra 2 - 4/14/14

CH2MHILL
Plateau Remediation Company

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WMP-200-4.12 (PRC-PRO-NS-52318), SWOC Abnormal Container Management Program, Revision 20, Change 2, Dated 08/23/2013

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Administrative Procedure

WMP-200-4.12

PRC-PRO-NS-52318

SWOC Abnormal Container Management Program

Revision 20, Change 2

Published: 08/23/2013
Effective: 08/23/2013

Program: Nuclear Safety
Topic: Nuclear and Safety Systems

Technical Authority: Rosser, James
Functional Manager: Hamada, Frank

Use Type: Administrative

JHA: Administrative
Periodic Review Due Date: 02/07/2017
Rev. 20, Chg. 2
USQ Screen Number:

- Solid Waste Operations Complex : **Categorical Exclusion:** GCX-7 (Minor Change) **Screener:** Bushore, Robin

CHANGE SUMMARY

Description of Change

Added non-sealed sources to Applicability section.

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1.0 INTRODUCTION

1.1 Purpose

This procedure provides direction and information on activities associated with management of abnormal waste containers that require special tracking and handling in accordance with HNF-14741, *Master Documented Safety Analysis (MDSA) for the Solid Waste Operations Complex (SWOC)*, and HNF-15280, *Technical Safety Requirements for the Solid Waste Operations Complex*. Waste containers meeting the criteria of Appendix A are required to be managed under the Abnormal Container Management Program (ACMP).

1.2 Scope

This procedure provides processes to identify, manage, and track abnormal waste containers in accordance with criteria defined in HNF-14741 and HNF-15280. The ACMP provides increased attention to containers that may present an elevated risk. Containers meeting criteria for entry into the ACMP as established in TSR SAC 5.6.4 (Container Management), TSR AC 5.7.8 (ACMP), and TSR AC 5.7.9 (Waste Acceptance Program) will be evaluated for actions needed to prevent or minimize occurrence of waste container related accidents. Immediate, mitigative, and corrective actions will be developed as required and taken based on evaluation results. Containers in this program will be tracked to ensure required actions will be taken to provide safe management of the waste.

Waste containers with discrepancies related to Treatment, Storage, and Disposal Dangerous Waste Permit and/or Waste Isolation Pilot Plant (WIPP) criteria and that require special tracking under the associated Discrepant Container Management Program (DCMP) are addressed by WMP-200, Section 4.29, *SWOC Discrepant Container Management Program*. Waste containers meeting Criteria 1, 3, 7, and/or 8 of Appendix A should also be considered for entry into the DCMP.

1.3 Applicability

The requirements of this procedure are applicable in all modes where waste containers (or non-sealed sources) are managed in SWOC facilities, except in the reactor compartment trench (Trench 94).

1.4 Implementation

This procedure implements requirements in the following documents:

- HNF-14741, *Master Documented Safety Analysis (MDSA) for the Solid Waste Operations Complex (SWOC)*
- HNF-15280, *Technical Safety Requirements (TSR) for the Solid Waste Operations Complex*

2.0 RESPONSIBILITIES

All responsibilities associated with this procedure are identified in the process steps of Section 3.0.

3.0 PROCESS

3.1 Initial Actions for Abnormal Container Management Program

Actionee	*Step*	*Action*
All Personnel	1.	IF container issues are identified that meet or have the potential to meet the ACMP criteria in Appendix A, THEN NOTIFY Facility Operations Manager and ACMP Evaluator. **[TSR 5.6.4.b, d, e; TSR 5.7.8; TSR 5.7.9 b, c]**

NOTE: *Safe configuration is defined as "the minimization of risk during ongoing processes or operations by the chemical and/or physical form of material and/or arrangement of material and/or equipment." **[TSR 1.1]***

Facility Operations

2. IF the container requires immediate action to place affected operations in the immediate area in a safe configuration such that the container will not be disturbed or impacted by other operations in the general area/facility,
THEN PERFORM the following:

   a. NOTIFY the Facility Operations Manager that immediate action is required.

   b. FOLLOW facility and/or project procedures to place the immediate area in a safe configuration. **[TSR 5.7.8.a]**

3. IF the container meets ACMP criteria,
THEN PLACE an ACMP label on the container in a visible location within 1 day of evaluation.
OR IF the container is not accessible,
THEN as soon as container becomes accessible.

   - Labeling is not required for containers that have not been retrieved from Low Level Burial Ground (LLBG) trenches.

4. IF the container does not meet ACMP criteria,
THEN MANAGE the waste per facility and/or project procedures and Field Work Supervisor (FWS) direction,
AND EXIT this procedure.

NOTE: *Any updates to the SWITS U307 Screen must be saved, or changes will be lost. This can be done by clicking the "Save" icon in the menu bar at the top of the screen or by pressing the "F1"' key.*

ACMP Evaluator

5. IF the container(s) meets ACMP criteria,
THEN PERFORM the following in the SWITS U307 screen.

   a. QUERY for the container by CIN.

   b. ENTER the Date that the issue was identified,
   AND SELECT the issue from the dropdown menu.

Actionee	Step	Action
		c. The ACMP box will be checked automatically. IF the issue is Criterion 1, 3, 7, or 8 of Appendix A (physical damage, bulged drum, unknown contents, or contents do not meet WAC for the facility), THEN ENSURE that the DCMP box is checked as well.
		d. SELECT Immediate Actions taken from the Immediate Actions drop-down menu in the Immediate Actions Tab, AND ENTER any comments regarding the specific issue with the waste container and actions taken.
		1) IF no immediate actions were needed, THEN SELECT "No Immediate Action Required."
		e. SAVE the data before closing the U307 window.

NOTE:
- *Upon saving the record, an automatic email notification will be sent to ACMP Evaluators and Facility Operations Managers.*
- *Selecting Physical Damage from the Issue dropdown menu will implement a 30-Day mitigation clock. Selecting Bulged TRU drums (or bulged LLW/LLMW drums that cannot be overpacked) will implement a 5-Day mitigation clock. These clocks start from the date of discovery of the ACMP Condition.* ***[TSR 5.6.4.d and TSR 5.7.8.b]***
- *"Mitigation of the container means that the container has been placed in a configuration such that the contents are protected from environmental conditions that may further degrade the containers or may cause a spread of contamination." Appropriate mitigating actions may be container or facility specific.* ***[TSR AC 5.7.8.c]***
- *Following mitigation, additional actions may be required under the ACMP action plan prior to exiting the ACMP.* ***[TSR-5.7.8.b & c]***
- *The ACMP action plan does not constitute a stand-alone work document. Work that is required to satisfy the ACMP action plan must be performed in accordance with approved work documents such as operating procedures, work packages, or a recovery plan.*

Facility Operations Manager	6.	IF the container meets ACMP criteria, THEN PERFORM the following:
		a. ENSURE an Action Plan is developed that addresses the safe handling and storage of the container.
		b. COORDINATE with the ACMP Evaluator AND UTILIZE subject matter experts (SMEs) to provide input to the action plan, if deemed appropriate by the ACMP Evaluator. **[TSR 5.7.8.b]**

Actionee	Step	Action

NOTE: *At a minimum, the Action Plan will consist of any mitigation action required and the final action(s) required to correct the abnormality and to remove the container from the ACMP. The Plan may include requirements such as:*

- *Additional labeling*
- *Inspection frequency while the container is in the ACMP, if more than the monthly surveillance*
- *Additional handling, storage or segregation criteria*
- *Completion criteria for TRU bulged drums and LLW/LLMW bulged drums that cannot be overpacked. The requirement is to complete venting within 5 calendar days.* ***[TSR 5.6.4.d]***

ACMP Evaluator

c. ENTER each step of the ACMP Action Plan in the ACMP Action Plan Tab of the U307 Screen in SWITS.

d. ENSURE any required Mitigation Action is noted as such and is the first step(s) listed in the Action Plan.

e. USE the Move Step button, to move Action Plan steps up or down, in the U307 screen.

f. SELECT appropriate individual from the Responsible ACMP Evaluator drop-down menu. This will be the person who carries out Responsible ACMP Evaluator actions throughout the remainder of this procedure.

NOTE: *At a minimum, the Responsible ACMP Evaluator and the Facility Operations Manager will approve the Plan. Additional approvers may be designated by the ACMP Evaluator and may include, but are not limited to:*

- *Radiological Control Manager*
- *Nuclear Safety/Criticality Safety Representative*
- *Transportation and Packaging Representative*
- *Receiving Facility Operations Manager*
- *Waste and Transportation Services (WTS) Representative*

Reviewers

g. VERIFY actions in the Action Plan are sufficient for the container, AND GIVE approval of the plan in writing (email is OK) to the Responsible ACMP Evaluator and Facility Operations Manager.

Actionee	*Step*	*Action*
Facility Operations Manager / ACMP Evaluator	h.	ENSURE all designated reviewers approve the Action Plan. • This SHALL be done in writing (email is OK), and a record SHALL be maintained of the approvals. • Below is a link to the Approvals Folder of the ACMP Records Area in IDMS. Emails <u>or</u> .pdf typed/handwritten approvals can be dragged or pasted to this folder online. http://idmsweb.rl.gov/idms/livelink.exe?func=ll&objid=166953084&objAction=browse&sort=name&viewType=1
Reviewers		1) VERIFY actions in the Action Plan are sufficient for the container, <u>AND</u> GIVE approval of the plan in writing (email is OK) to the Responsible ACMP Evaluator and Facility Operations Manager.
Responsible ACMP Evaluator	i.	CHECK the Action Plan Approved box under the ACMP Action Plan Tab when all necessary approvals are obtained.
	j.	SUBMIT Action Plan Approvals to Records.
ACMP Manager	k.	<u>IF</u> Criteria 1, 3, 7, and/or 8 of Appendix A are documented for entry into the ACMP, <u>THEN</u> NOTIFY the DCMP Evaluator and/or facility Environmental Compliance Officer (ECO) to ensure DCMP consideration.
	l.	<u>Any revisions to the approved Action Plan will be reviewed and approved by, as a minimum, all initial approvers.</u>
	m.	<u>Repeat steps 3.1.6a through 3.1.6k for the revised Action Plan as applicable.</u>

3.2 Tracking of ACMP Containers

Actionee	*Step*	*Action*
NOTE:		*This action stops the 30-Day or 5-Day ACMP mitigation clock. Containers requiring mitigation SHALL be mitigated prior to the end of the clock.* ***[TSR 5.7.8.b]***
Responsible ACMP Evaluator	1.	<u>WHEN</u> container is mitigated, <u>THEN</u> PERFORM the following:
	a.	UPDATE the Mitigation Complete Date in the ACMP Mitigation Tab of the U307 Screen, <u>AND</u> SELECT mitigation from the Mitigation Description drop-down menu.
	b.	NOTIFY both the SWOC ACMP Manager and the Facility Operations Manager that mitigation is complete and the clock is stopped.

Actionee	*Step*	*Action*
Facility Operations Manager	2.	IF mitigation cannot be completed within the 30- or 5-day deadline, THEN PERFORM the following: **[TSR 5.7.8.c]**
		a. PREPARE an additional or revised Action Plan in SWITS, AND OBTAIN approvals prior to the end of the clock.
		b. NOTIFY the DOE-RL Facility Representative prior to the end of the clock via email.
	3.	ENSURE each container in the ACMP is visually monitored at least once each calendar month (or as required by the Action Plan, if more than once per month) to verify that labeling is intact and that safe configuration is being maintained.
		a. TAKE appropriate action to correct any deficiencies.
		b. NOTIFY the SWOC ACMP Manager upon completion of each monthly monitoring process and of any deficiencies noted/actions taken.
		c. NOTIFY the Responsible ACMP Evaluator of each completed action.
Responsible ACMP Evaluator	4.	TRACK the Action Plan.
		a. ENTER date each action is completed in ACMP Action Plan Tab of U307 Screen.
Operations		b. IF problems arise which prevent completion or require alteration of the Action Plan, THEN NOTIFY Facility Operations Manager and SWOC ACMP Manager.
	5.	WHEN the Action Plan is Complete, THEN: **[TSR 5.7.8.d]**
Responsible ACMP Evaluation		a. NOTIFY Facility Operations Manager and ACMP Manager that the issue is ready for closeout.
ACMP Manager		b. ENTER the Closeout date at the bottom of the ACMP Action Plan Tab.
Operations		c. ENSURE ACMP Label is removed or obliterated from the container.
Responsible ACMP Evaluator		d. IF Criteria 1, 3, 7, and/or 8 of Appendix A were documented for the container to be removed from the ACMP, THEN NOTIFY the DCMP Evaluator and/or facility ECO to ensure DCMP consideration.

Actionee	Step	Action
NOTE:		*Other reports that may be useful include the R361, R363, and R364 reports. The R361 report shows all ACMP and DCMP issues for a given container PIN, the associated Action Plans, and actions taken. The R363 report lists ACMP containers based on their location or based on the Issue. The R364 report lists only the containers that have a clock associated with them.*
Facility Operations Managers	6.	OBTAIN a SWITS R365 report at least once each calendar month to verify the status of each container in the ACMP. This report is for reference use and may be issued more frequently if deemed appropriate by the SWOC ACMP Manager.
	7.	ENSURE monthly monitoring is completed for all ACMP containers at each SWOC facility.

3.3 Transfer or Shipment of ACMP Containers

Actionee	Step	Action
NOTE:		*This subsection describes addressing facility transfer notifications for containers entered into the ACMP.*
Responsible ACMP Evaluator	1.	VERIFY the following general requirements:
		a. The Responsible ACMP Evaluator will act as the point of contact to interface with the WTS-assigned Treatment Storage Disposal Unit Representative (TSDR) and Production Control on waste transfer activities for active ACMP containers.
		b. Prior to waste transfers between SWOC facilities, the initiating SWOC facility shall evaluate the waste containers to identify any active ACMP containers. To assist in identification of active ACMP containers, the ACMP status can be obtained from the SWITS Report R365, "ACMP Onsite Container Report."
		c. The action plan for an active ACMP container being transferred to another SWOC facility shall be provided to and approved by the receiving Facility Manager or Operations Manager and ACMP Evaluator in writing prior to transfer. This Action Plan Approval shall be retained as a record as in Step 3.1.
		d. The WTS TSDR will review ACMP status of each container proposed to be transferred within SWOC. The container will not be approved for transfer until the evidence of ACMP action plan approval by the receiving facility is obtained.

Actionee	*Step*	*Action*
WTS	2.	IF an ACMP container is newly generated, requires a facility transfer to complete corrective actions, or otherwise requires WTS support, THEN PERFORM the following: a. WHEN the container is approved for shipment, THEN ADD a comment on the SWITS 356 report that an active ACMP container is included in the shipment.

NOTE: *Any container in the ACMP designated for off-site shipment must meet the Action Plan requirements.*

	3.	IF ACMP containers will be sent off-site, THEN PERFORM the following: a. REVIEW the ACMP status of each container proposed for off-site shipment.
Production Control or Authorized Designee		b. INFORM the SWOC ACMP Manager once the ACMP container has shipped provided shipment of the container off-site is the final action to complete the Action Plan and the off-site facility has accepted receipt of the shipment.

4.0 FORMS

None

5.0 RECORD IDENTIFICATION

All records are required to be managed in accordance with PRC-PRO-IRM-10588, *Records Management Processes*.

Records Capture Table

Name of Record	Submittal Responsibility	Retention Responsibility
ACMP Action Plan Approvals	SWOC ACMP Manager	WTS Records

6.0 SOURCES

6.1 Requirements

HNF-14741, *Master Documented Safety Analysis (MDSA) for the Solid Waste Operations Complex (SWOC)*
HNF-15280, *Technical Safety Requirements for the Solid Waste Operations Complex*

6.2 References

HNF-EP-0063, *Hanford Site Solid Waste Acceptance Criteria*
PRC-PRO-IRM-10588, *Records Management Processes*
WMP-200, Section 4.29, *SWOC Discrepant Container Management Program*

6.3 Bases

DOE/RL-2001-36, *Hanford Sitewide Transportation Safety Document*
HNF-11724, *CH2M HILL Plateau Remediation Company Safety Management Programs*
HNF-16166, *Required Staging Times for Hydrogen Diffusion in Vented Waste Containers*
HNF-21239, *Solid Waste Operations Complex (SWOC) Fire Hazards Analysis*

7.0 APPENDIXES

Appendix A - Criteria for Entry in the ACMP

Figure 1 – Sample SWITS U307 Screen: Immediate Actions Taken

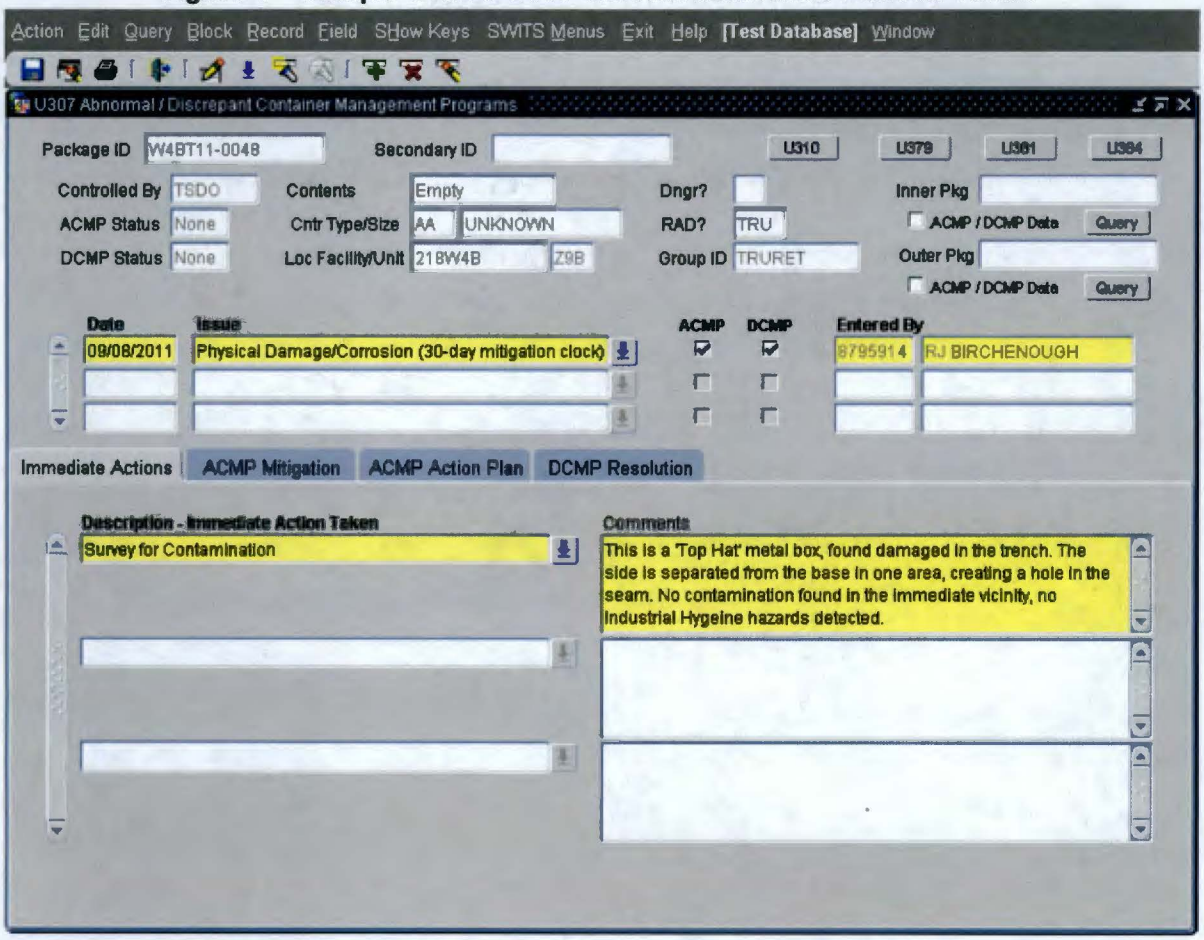


Figure 2 – Sample SWITS U307 Screen: Mitigation

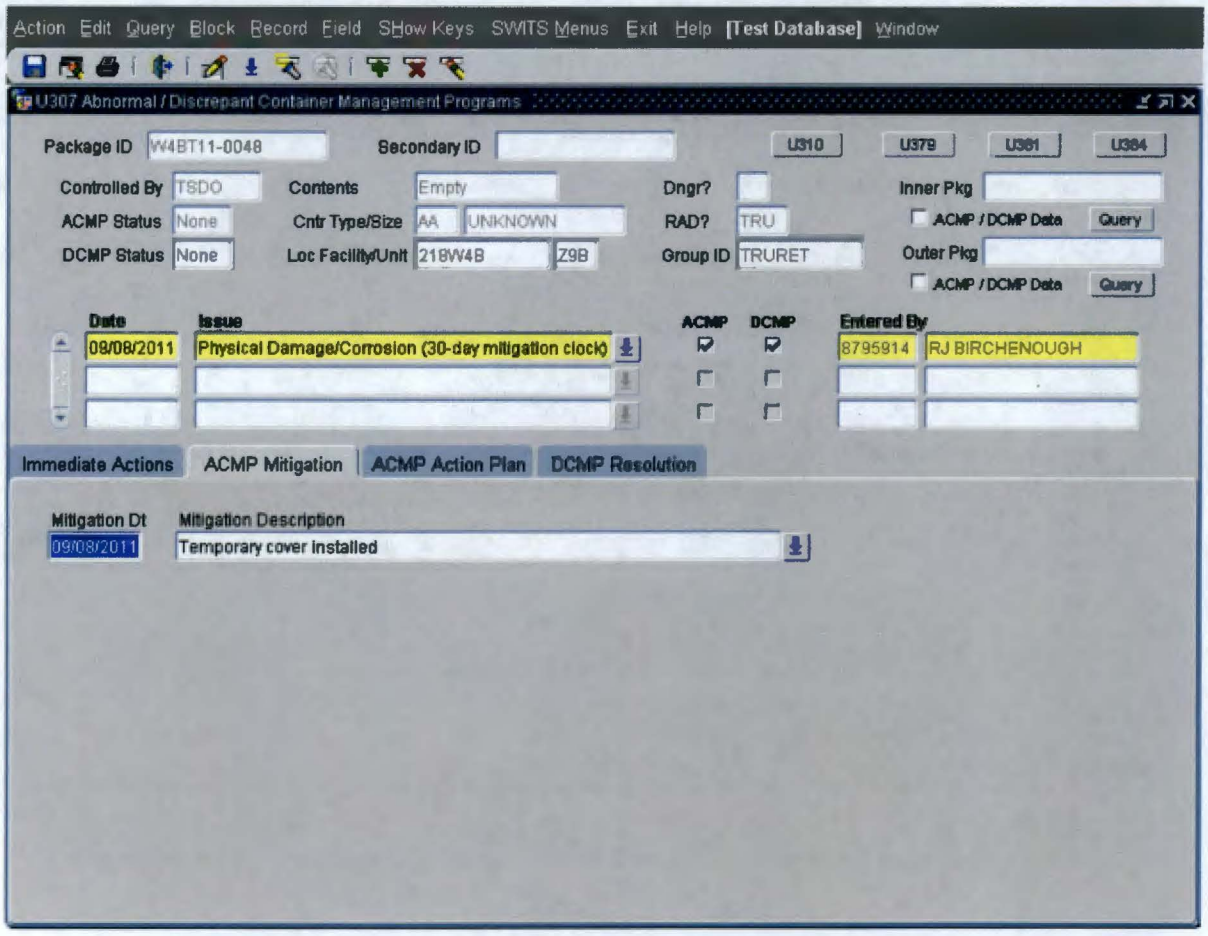
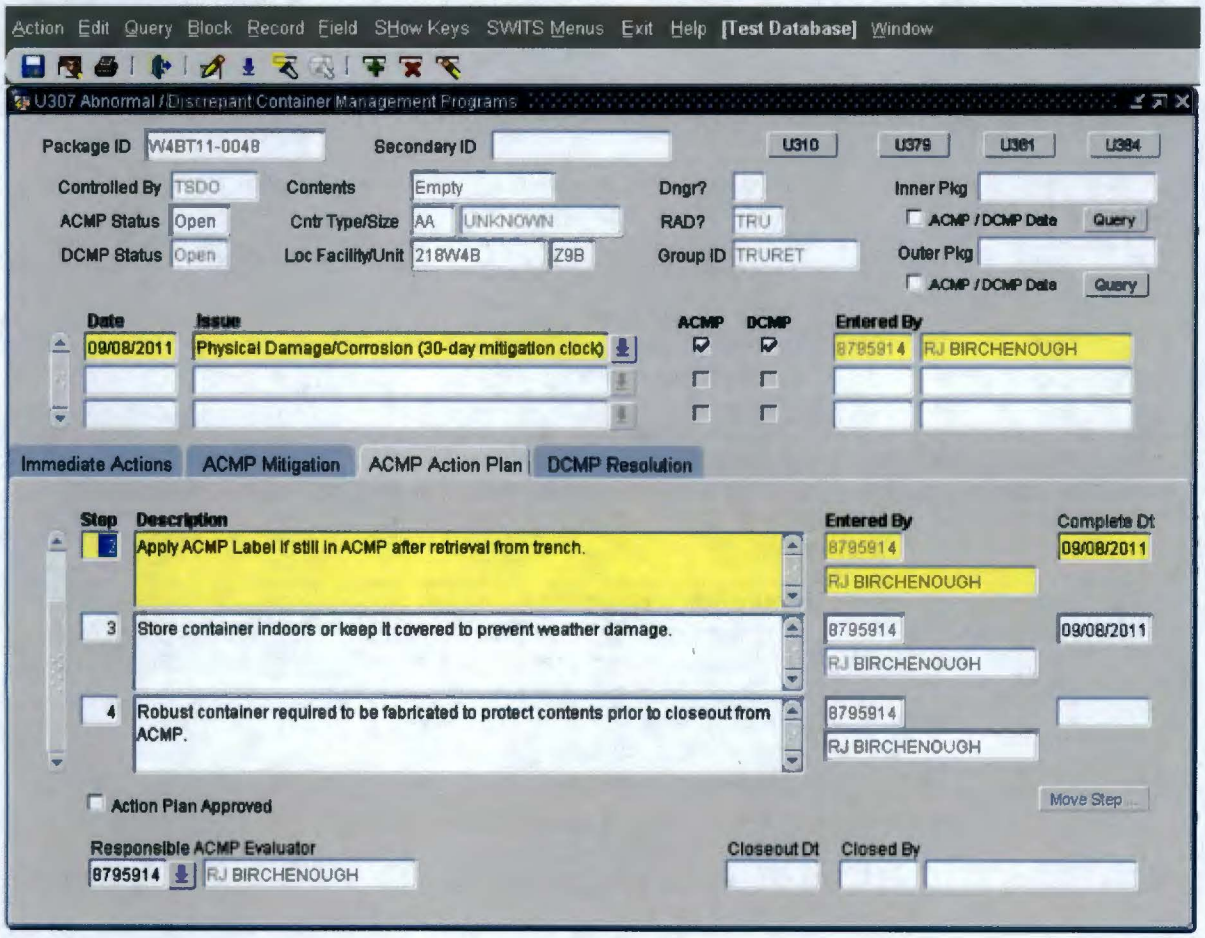


Figure 3 – Sample SWITS U307 Screen: Action Plan



Appendix A - Criteria for Entry in the ACMP

These items indicate ACMP categories and criteria from TSR SAC 5.6.4.b, d, e, TSR AC 5.7.8, and TSR AC 5.7.9.b, c, as applicable. Containers meeting any of the ACMP criteria must be entered into the ACMP. Both the category and criteria must be evaluated in making ACMP determinations.

	Criteria	***Description***	***Recommended Reviewers***
1	Indications of bulging **[TSR 5.6.4.b & d; TSR 5.7.8]**	A bulged lid interferes with a straight edge laid across the top of the container. The straight edge should span the diameter of the drum. The side wall is bulged, as determined visually. Rocking when setting on flat surface indicative of a raised section center region of bottom surface.	Nuclear Safety, Industrial Safety, Operations, Shipper, DCMP
2	Non-standard containers stored outside **[TSR 5.7.8]**	A non-standard waste container (waste stream) stored outside for which no defined path forward to storage or disposal currently exists.	Nuclear Safety, Shipper, Operations
3	Containers with unknown contents **[TSR 5.7.8]**	Information is obtained that causes the characterization to be questioned and a technical evaluation determines that insufficient information is available to ensure proper management of the container (e.g., ignitable, corrosive, explosive, or incompatible contents). For WRP: Container is not identifiable by PIN/CIN, seal number, and does not meet the physical descriptions identified in the records or cannot be tied to acceptable knowledge of a waste lot or waste stream.	Nuclear Safety, ECO, TRU Program (if TRU waste), Shipper, DCMP
4	Unvented containers that require venting **[TSR 5.7.8]**	A technical evaluation determines venting is required. Examples include: Unvented container discovered at CWC, WRAP or T Plant that requires venting. LLW and TRU boxes that do not have an established vent path or contain a multi-piece gasket, OR Containers that have completed the retrieval process, been released for unrestricted movement and processing, and subsequently determined to be unvented.	Nuclear Safety, Operations, TRU/MLLW Program, Shipper

Appendix A - Criteria for Entry in the ACMP

These items indicate ACMP categories and criteria from TSR SAC 5.6.4.b, d, e, TSR AC 5.7.8, and TSR AC 5.7.9.b, c, as applicable. Containers meeting any of the ACMP criteria must be entered into the ACMP. Both the category and criteria must be evaluated in making ACMP determinations.

	Criteria	***Description***	***Recommended Reviewers***
5	Unvented, non-drum containers identified in the LLBG that require venting **[TSR 5.7.8]**	A technical evaluation determines venting is required (e.g., boxes that do not have an established vent path or contain a multi-piece gasket). Unvented waste container that requires venting, other than 55-gal drums.	Nuclear Safety, Operations, TRU/MLLW Program, Shipper
6	Container exceeds the LFL. **[TSR 5.7.8]**	After released for unrestricted movement abatement, the hydrogen concentration is determined to be greater than 5% or the concentration of other flammable gases are greater than the LFL.	Operations, TRU Program, Shipper
7	Waste containers that do not fully meet the waste acceptance criteria (HNF-EP-0063) **[TSR 5.7.8; TSR 5.7.9.c]**	Waste containers with waste acceptance (HNF-EP-0063) discrepancies that cannot be resolved using normal operating procedures or that involve one of the preceding ACMP entry criteria.	Operations, ECO, TRU/MLLW Program, Shipper, DCMP
8	Damaged or corroded (degraded) containers **[TSR 5.6.4.e; TSR 5.7.8]**	Damaged or corroded (degraded) containers that cannot be safely handled using approved operating methods and/or procedures without a likely spread of contamination.	Engineering, Criticality Safety, Nuclear Safety, RadCon, Operations, Shipper, DCMP