

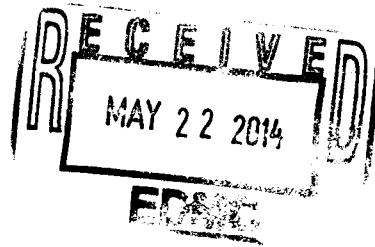


Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

14-AMRP-0184

MAY 20 2014

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 4.6.5

- 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 4.6.5, Transmitted by U. S. Department of Energy Letter 14-AMRP-0108, dated February 20, 2014," 14-NWP-043, dtd. March 27, 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 4.6.5," 14-AMRP-0108, dtd. February, 20, 2014.

This letter transmits the additional information requested in the State of Washington Department of Ecology's letter dated March 27, 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.

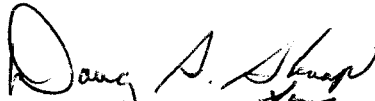
Please note that under the terms of the Agreed Order, Section 4.4, within fifteen calendar days "Ecology will determine whether each action has been implemented as required by the schedule in section 4.6 of this Order." There was no provision in the order for extending the determination past fifteen days.

Ms. J. A. Hedges
14-AMRP-0184

-2-

MAY 20 2014

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
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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 4.6.5, Ecology letter
dated March 27, 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 4.6.5, Ecology Letter Dated March 27, 2014
2. SW-100-095 (SWSD-PRO-OP-51632), "Overpack Containers", Revision 13, Change 6, Dated 01/06/2014
3. SW-040-043 (SWSD-PRO-OP-51714), "Inspect CWC & Miscellaneous Buildings", Revision 9, Change 5, Dated 04/02/2014

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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 4.6.5, Ecology Letter Dated March 27,
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 4.6.5,
ECOLOGY LETTER DATED MARCH 27, 2014**

Bullet Number From Ecology Letter	Ecology Request	DOE/CHPRC Response	Documents Supplied
First	<p>Ecology has independently documented that labeling is improved. However, the documentation supplied by the U.S. Department of Energy does not include the labeling procedure when wastes are transferred from one container to another.</p> <p>Submit to Ecology the procedure(s) operators and fieldwork supervisors follow to ensure that the facility meets this requirement.</p>	<p>Procedure SW-100-095, Overpack Containers, Revision 13, Change 6, Steps 4.1.3, and 4.2.16 are examples where direction is provided to label overpack container the same as the inner container. There are additional steps throughout the procedure.</p>	<p>SW-100-095, Overpack Containers, Revision 13, Change 6, dated 01/06/2014</p>
Second	<p>The “Timely Order, CWC-14-001,” dated February 10, 2014, states, “Missing or obscured labels will be corrected on the day they are discovered missing or damaged.” Procedure SW-040-043, 4.46(b) allows the option, if materials are not available to immediately correct the problem, then the problem can be noted on the inspection log. <i>Neither the Timely Order nor the SW-040-043 state clearly how the problem will be corrected the same day if option (b) is used.</i></p> <p>Submit to Ecology the procedure(s) for replacing missing or obscured labels.</p>	<p>Since the submittal, SW-040-043 has been updated to reflect the new requirements from the Agreed Order. This update takes the place of the Timely Order, CWC-14-001, which was temporarily put into place to address the “on the day they are discovered” requirement while the operating procedure was updated.</p> <p>Procedure SW-040-043, Inspect CWC & Miscellaneous Buildings, Revision 9, Change 5, issued 4/02/14, Section 4.3 Weekly Inspection, Step 4.3.4.i provides direction to correct missing or obscured labels the same day they are discovered. The expectation is to correct an identified</p>	<p>SW-040-043 (SWSD-PRO-OP-51514) “Inspect CWC & Miscellaneous Buildings,” Revision 9, Change 5, dated 04/02/14</p>

**RESPONSE TO WASHINGTON STATE DEPARTMENT OF ECOLOGY REQUEST FOR ADDITIONAL INFORMATION FOR
AGREED ORDER AND STIPULATED PENALTY NUMBER DE 10156, SECTION 4.6.5,
ECOLOGY LETTER DATED MARCH 27, 2014**

		<p>labeling deficiency on the same day it is discovered. Step 4.3.5 provides direction on what to do if a problem condition exists and cannot be immediately corrected. Examples would include adverse weather conditions, emergency response requirements, and safety related issues. Similarly, Section 4.4 Weekly CWC RCRA 90-day AA Inspections, Step 4.4.6.a provides direction to correct container marking/labeling problems immediately and record the corrections in the comments section. The expectation is to correct labeling deficiencies immediately the same day they are discovered. Step 4.4.6.b provides direction to record RCRA deficiencies that cannot be corrected immediately. Examples would include adverse weather conditions, emergency response requirements, and safety related issues.</p>	
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**SW-100-095 (SWSD-PRO-OP-51632), “Overpack
Containers”, Revision 13, Change 6, Dated 01/06/2014**

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Technical Procedure

SW-100-095

SWSD-PRO-OP-51632

Overpack Containers

Revision 13, Change 6

Published: 01/06/2014

Effective: 01/06/2014

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

Topic: Operations

Technical Authority: Rosser, James

Functional Manager: Gilles, David

Use Type: Reference



JHA: Technical - Skill Based

Periodic Review Due Date: 03/01/2015

Rev. 13, Chg. 6

USQ Screen Number:

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

CHANGE SUMMARY

Description of Change

Add new step 4.2.12 and update step references throughout for better work flow.

Overpack Containers

Published Date: 01/06/2014

SWSD-PRO-OP-51632

Effective Date: 01/06/2014

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Overpack Containers

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1.0 INTRODUCTION

1.1 Purpose

This procedure provides instructions for overpacking containers located in Central Waste Complex and Low-level Burial Grounds (CWC/LLBG) facilities. Instructions include overpacking containers and boxes and labeling the overpack.

1.2 Scope

This procedure applies to waste within CWC/LLBG facilities.

1.3 Applicability

This procedure applies to containers within CWC/LLBG which require overpacking.

1.4 Implementation

This procedure is implemented upon publication

2.0 PRECAUTIONS & LIMITATIONS

2.1 Warnings & Cautions

- 2.1.1 Personal protective equipment, as applicable, and required by the radiological work permit (RWP) or automated job hazard analysis (AJHA) must be worn when handling drums.
- 2.1.2 Industrial Health and Safety personnel (IH) must be consulted to ensure personnel hazards associated with chemicals and hazardous materials are identified and controls are in place.
- 2.1.3 If animals, snakes, insects or rodent droppings are encountered during the performance of this evolution then work shall be stopped and the FWS notified. Work may not continue unless directed by the FWS.
- 2.1.4 Only the quantities of flammable product (i.e., 3M Super 77 Classic Spray Adhesive and Strafe Solvent) needed should be introduced for use during the current evolution. Unused product should be returned to proper storage.
- 2.1.5 Containers with NucFil filters installed should be stored in such a way as to prevent debris and/or liquid from covering or building up around the filter causing damage.

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2.2 Limitations

- 2.2.1 All new containers must meet the specifications defined for UN1A2 and Department of Transportation (DOT) 7A Drums. **[CHPRC-01039]**
- a. New containers must have a pre-use inspection performed and documented on Site Form A-6005-605, *Preuse Inspection*, as required by PRC-PRO-TP-19358, *Surveillance and Maintenance of Reusable Radioactive Material Packaging*.
- 2.2.2 Free liquids are not allowed in steel drums. Equipment containing liquids should be drained prior to packaging in drums. **[CHPRC-01039]**
- 2.2.3 All overpack containers that require venting shall be vented with a NucFil type filter. **[CHPRC-01039]**
- 2.2.4 All 85 gal overpack drums used to overpack bulged drums must meet safety significant requirements.
- 2.2.5 If contamination is detected that exceeds the limits of area radiological postings and/or governing RWP, work shall be stopped and the field work supervisor (FWS) and RadCon management notified.
- 2.2.6 Fissile containers are handled and arrayed by the assigned Criticality Prevention Specification (CPS) Container Type per CPS-SWOC-001 (CWC). The CPS, postings, and a guide for recommended array markings are located on the intranet under SWOC Criticality Safety Documents at <http://prc.rl.gov/rapidweb/dwfrs/index.cfm?PageNum=13>.
- a. Waste with > 1 FGE is required to be packaged in 55-gallon drum or larger size container.
- b. 55-gallon drum or larger containers are exempt from fissile labeling and CPS requirements unless they contain \geq 15 FGE.
- 2.2.7 Container types assigned by the Criticality Safety Representative (CSR) are entered in SWITS and print out on the SWITS-generated fissile labels. The assigned container type may change because of new data, including new NDA results or overpacking of multiple containers.
- 2.2.8 Unvented TRU drums containing 33 or more DE-Ci shall be in vented overpacks while the drum is being vented and during the abatement period after venting. The abatement period ends when the flammable gas hazard is abated (hydrogen concentration is determined to be less than 5% and other headspace gases are determined to be non-flammable). **[TSR 5.6.1.c]**
- 2.2.9 A single waste container is limited to 82.5 DE-Ci. **[TSR 5.6.2, Table 5]**

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- 2.2.10 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.
- 2.2.11 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]**
- 2.2.12 Lifts of TRU waste that exceed 10,000 lbs or lifts of loads exceeding 10,000 lbs over exposed TRU waste shall be defined as critical lifts. This is applicable in facility zones with 100 DE-Ci or greater of exposed waste or with single container inventory of 10 DE-Ci or greater. **[MDSA Sect. 11.3.1]**
- 2.2.13 Lifts performed over exposed TRU or suspect TRU containers shall be minimized to the extent possible. This is applicable in facility zones with 100 DE-Ci or greater of exposed waste or with single container inventory of 10 DE-Ci or greater. **[MDSA Sect. 11.3.1]**
- 2.2.14 Unvented TRU drums greater than 33 DE-Ci shall be placed in vented overpacks prior to placement in a batch. **[TSR 5.6.4.f.2]**
- 2.2.15 Vehicles/containers with more than 40 cumulative gallons of propane 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]
- 2.2.16 2402 Buildings are limited to 1 propane-powered vehicle with 2 exhaust fans operating and one rollup door open. 2403 or 2404 buildings are limited to 2 propane-powered vehicles with 2 exhaust fan operating and at least one rollup door open. These limits are in place to mitigate carbon monoxide build-up.

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2.2.17 Adverse Weather Conditions:

- a. Adverse weather conditions such as but not limited to wind, wind gusts, rain, snow and extreme temperatures, etc. that may inhibit the operator's or the equipment's ability to safely handle loads, shall be evaluated by supervision and crane operator before any lifting operation. Limitations and conditions imposed by equipment manufacture for adverse weather shall be implemented. Mobile crane operations shall be suspended when lightning is within 50 miles of the work location, as determined by the Hanford Meteorological Station. The Hanford Meteorological station can be contacted at (509) 373-2716.
[DOE-RL-92-36, Chapter 14, Step 14.5.3]
- b. The above Step 2.2.17.a, also applies to forklifts and aerial lifts as directed in PRC-PRO-SH-28034, *Adverse Weather*, Section 4.2 and DOE/RL-92-36, *Hanford Hoisting and rigging Manual*, Section 6.7.

2.2.18 Additional CWC Safety Basis Requirements:

- a. Ignition sources will be controlled via the following:
[TSR 5.7.1.ignition control & FHA]
 - 1) Hot work permit
 - 2) No smoking or open flames are permitted in designated no-smoking areas
 - 3) Use of tools that may be ignition sources like power tools, welding equipment, and heat generating devices must be approved by FWS/management.
 - 4) No empty wooden pallets shall be stored inside any CWC waste storage building.
- b. Waste shall be stored in CWC buildings only in noncombustible containers. **[FHA CWC Key 1.3.2.1 & 2]**
- c. A minimum spacing of 12 ft shall be maintained between waste array zones of non-combustible waste containers in CWC buildings and this space shall be free of stored combustibles.
[TSR 5.6.4.g]
- d. 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]

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2.2.19 Work involving fissionable material shall be supervised by a qualified fissionable material operator or supervisor.

3.0 PREREQUISITES

3.1 Tools, Equipment, & Materials

- Barcode scanner.
- Liners.
- Noncombustible overpack drums.
- Diatomaceous earth or other approved absorbent.
- Forklift with approved drum lifting device.
- Contamination control/decontamination supplies.
- Dynamometer, Dillon EDextreme, 2,500 lb capacity, calibrated scale, or equivalent.
- Labels/markings.
- Non-combustible/combustible pallets.
- Banding equipment and supplies.
- Wire cutters.
- Hard hat, as required
- Leather gloves.
- Safety shoes.
- Safety glasses.
- Appropriate filters.
- A-frame with hoist (CWC).
- Duct tape or wire ties.
- Hearing protection.
- Socket wrench.
- Wooden wedges.
- Calibrated torque wrench(s).
- Measuring device.
- Dust mask.
- Rubber mallet.
- Sharpie or other marking pen.

3.2 Special Personnel Requirements

- Radiological Control Technician (RCT)
- Quality Control (QC), as needed to meet torque requirements.

3.3 Performance Documents

- SW-100-141, *Management of Waste at LLBG*
- SW-100-143, *Management of Solid Waste in CWC*

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3.4 Pre-Start Items

3.4.1 CWC/LLBG management has identified containers requiring overpacking.

3.4.2 Containers to be overpacked have been staged at the job site.

3.4.3 CWC/LLBG management has identified containers that may require fissile labels.

NOTE: CSR review not required for overpacking a single container.

3.4.4 The CSR has provided updated CPS Container Types and any special instructions for placement of fissile container(s) into overpack containers.

3.4.5 If directed by FWS, pre-job safety briefing has been conducted and documented.

3.4.6 Equipment pre-use inspections of hoisting and rigging equipment (including forklifts) shall be performed and the equipment verified to be in proper working order before use. **[BMP]**

3.4.7 QC has been notified and is available to ensure torquing requirements are met.

3.4.8 Before using the TSR exception for limited exposed DE-Ci, Operations Support has provided documentation that exceptions to TSR ACs or AC elements may be applied.

3.4.9 A qualified fissionable material operator or supervisor has reviewed the applicable CPS(s) and posting(s) with the support staff and maintenance personnel prior to conduct of work.

3.4.10 For DOT compliant shipments, blocking and bracing requirements have been obtained from a certified shipper

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- NOTE:**
- Sections 4.1 through 4.7 may be performed independently, concurrently, repeated, or not performed when unneeded.
 - (RCT) at the beginning of the step means that radiological control technician must survey or support completion of step.
 - [TSR] after a step contains actions necessary to comply with TSRs of HNF-15280.
 - (FHA) after a step contains actions necessary to comply with Fire Hazards Analysis (FHA), HNF- 21239.
 - Transportation Safety determines container/packaging requirements based on characterization data.
 - Transportation Safety determines appropriate transportation safety basis prior to authorization to ship.
 - Appendix C contains supplemental information for using the barcode scanner and is intended as an enhancement to personnel training.

4.0 PERFORMANCE

4.1 Prepare Overpack (Drums)

4.1.1 REQUEST SDO to authorize waste movement. **[TSR 1.2]**

- NOTE:**
- Steps 4.1.2 through 4.1.5 may be performed in any order, as required.
 - Approved vent may be installed at any point in the preparation, waste packaging, or closure process. Vent may initially be installed hand-tight and torqued to the specified value at a later time, but prior to shipment. Vent installation, torquing, and the calibrated tools used to torque must be documented on Appendix A. The documentation shall be retained in the container PIN file. **[CHPRC-01039]**

4.1.2 INSPECT overpack drums to ensure: **[CHPRC-01039]**

- Lid and drum opening are round
 - Lid gasket in good condition
 - No burrs/sharp protrusions on drum lid or locking ring
 - Locking ring and bolt in good condition (not bent)
 - NucFil filter is present in lid, if applicable
 - Drums to be used have QC green-bordered barcode labels
- a. DOCUMENT overpack inspection results on site form A-6005-605.

4.1.3 IF applicable,
THEN MARK overpack drum with the same markings/labels found on inner container.

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- 4.1.4 PLACE empty overpack containers in designated overpacking area or as directed by FWS.
- 4.1.5 ENSURE empty overpacks are accepted (scanned) into CWC/LLBG.

4.2 Load Overpack (Drums)

- 4.2.1 REFER to Appendix D for list of storage or disposal categories, as applicable.
- 4.2.2 STORE incompatible waste in separate containment systems (see Appendix E), as applicable. **[FHA]**
- 4.2.3 (RCT) IF necessary, THEN PERFORM radiation and contamination survey of container being overpacked.
- 4.2.4 RECORD CIN of original drum and overpack in Overpack Data section on Appendix A.
- 4.2.5 SCAN container being overpacked to overpack container (see Appendix C, as needed).

NOTE: Free liquids are not allowed in overpacks. **[CHPRC-01039]**

- 4.2.6 IF required, THEN PLACE polyethylene liner (bag) inside overpack container.
 - a. ADD approximately 1-2 inches of absorbent inside polyethylene liner (bag).

NOTE: Approved methods for overpacking containers are lifting, tip and roll, or side and slide.

- b. Using approved method, PLACE container into overpack with approved lifting device and attachments.
 - c. ADD rest of absorbent to annulus space between polyethylene liner (bag) and inner container.
 - d. HORSETAIL poly liner closed with duct tape or wire ties.
- 4.2.7 IF for disposal in LLBG, THEN PERFORM the following:
 - a. NOTIFY FWS for type of void fill to be used.
 - b. ENSURE 90% void fill limit is met.

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- NOTE:**
- *The purpose of wedges or dunnage is to center and stabilize the load.*
 - *Wedges should be of sufficient length to extend from top of 55-gal drum to the bottom of the overpack container lid.*
 - *Wooden wedges are only required when a 55-gal drum is overpacked into an 85-gal drum and a NucFil-007LS high-efficiency particulate air (HEPA) drum vent filter is installed. [CHPRC-01039]*

- 4.2.8 IF overpacking a 55-gal drum,
THEN INSERT three wooden wedges (approximately equidistant) between inner drum and overpack.
- 4.2.9 IF overpacking any other container,
THEN INSERT dunnage between inner and outer containers, as needed.
- 4.2.10 RECORD wedges or dunnage and absorbent or void fill use on Appendix A.
- 4.2.11 SECURE lid on overpack.
- 4.2.12 Repeat appropriate step(s) 4.2.1 through 4.2.11 in this section until all containers have been overpacked.

- NOTE:**
- *The maximum gross weight is 935 lbs for 55-gallon drums and 948 lbs for 85-gallon drums. (CHPRC-01039)*
 - *Maximum gross weight shall not exceed certificate of compliance (COC) for any other container used.*
 - *Steps 4.2.13 and 4.2.14 may be performed out of order or concurrently.*

- 4.2.13 WEIGH container.
- a. MARK new container gross weight on container.
 - b. ENTER gross weight in Overpack Data section on Appendix A.
- 4.2.14 (RCT) PERFORM radiation and contamination survey
AND APPLY radiological survey sticker.
- 4.2.15 UPLOAD into SWITS
AND ENSURE information has been received.

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- NOTE:**
- *If placing more than one drum in an overpack, Waste and Transportation Services must input new CPS container types based on CSR instructions, after inner containers have been scanned to the new outer container.*
 - *Some containers which were previously marked fissile may not have sufficient fissile content to require fissile labels.*

- 4.2.16 IF containers were identified by FWS as possibly requiring fissile labels or previously marked fissile, THEN PERFORM the following:
- a. PRINT fissile labels for overpack containers.
 - b. APPLY fissile label to outer container.
 - c. For Type D, E, and X containers, APPLY unique highly visible identifiers
- 4.2.17 COMPLETE/SIGN Overpack Data section on Appendix A.
- 4.2.18 REPEAT appropriate step(s) 4.2.13 through 4.2.17 in this Section until all containers have been weighed.
- 4.2.19 REMOVE transient combustible materials. **[TSR 5.7.1.b&c]**

4.3 Torque Overpack Drum Lids

- 4.3.1 ENSURE QC is present to witness.
- 4.3.2 BEFORE torquing, ENSURE jam nut is loose.

NOTE: *Torque requirements for lid locking ring bolt and 2 inch head plug are specified by the manufacturer and are attached to the drum. Filter torque requirements are on Appendix C. **[CHPRC-01039]***

- 4.3.3 TORQUE the following to torquing requirements:
- Lid locking ring bolt
 - 2 inch head plug
 - Filter.
- 4.3.4 ENSURE there is a locking ring gap (i.e., locking ring ends not touching at full torque value).
- 4.3.5 IF locking ring cannot be tightened to specifications, THEN NOTIFY FWS.
- 4.3.6 RECORD torque specifications in Torque Data section on Appendix A.

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- 4.3.7 (QC) WITNESS application of required torque.
- 4.3.8 TIGHTEN jam nut to prevent unintentional loosening.
- 4.3.9 REPEAT appropriate step(s) in this section until all containers have been overpacked
- 4.3.10 COMPLETE and SIGN Torque Data section on Appendix A, verifying data is accurate and correct.
- 4.3.11 TURN IN all completed Appendices to FWS.
- 4.3.12 (RCT) IF required,
THEN PERFORM radiation and contamination survey.
- 4.3.13 MOVE container(s) per SW-100-141 for LLBG or SW-100-143 for CWC.

4.4 Overpack Containers into Standard Waste Box (SWB)

NOTE: *During inspection of the container, if defective parts or components are found, they MUST be replaced using original specification materials and requirements to maintain DOT-7A certification. In such cases, the manufacturer is to be contacted for replacement.*

- 4.4.1 For maintenance and inspection of SWB, PERFORM the following:
 - a. INSPECT all lift clips for damage or signs of fatigue.
 - b. INSPECT all riv-nuts for damage.
 - 1) IF riv-nut has minor thread deformation (e.g. burrs, cross thread),
THEN CORRECT thread deformation by running a 1/2-in. 13 UNC thread tap through riv-nut.
 - 2) IF a riv-nut is loose (rotates),
THEN PERFORM one of the following actions:
 - a) USE a riv-nut header tool to re-upset the riv-nut following manufacturer's tool instructions.
 - b) REMOVE protruding head of riv-nut
OR DRILL OUT riv-nut (allowing riv-nut body to fall in SWB body tube frame)
AND USE a riv-nut header tool to install a spare rivet using manufacturer's tool instructions.
 - c. INSPECT lid closure cap screws for sign of fatigue or damage,
AND REPLACE as needed.

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- d. INSPECT lid flange gasket.
 - 1) IF lid flange gasket is not installed,
THEN INSTALL lid flange gasket according to Appendix B, SWB Lid Flange Sealing Gasket Installation/Replacement Instructions.
 - 2) IF lid flange gasket is damaged, deformed, deteriorated, and/or shelf life has expired,
THEN REPLACE lid flange gasket according to Appendix B.
- e. INSPECT body shell flange and lid sealing surface for cleanliness, AND CLEAN as needed.
- f. INSPECT all container interior and exterior surfaces for signs of damage, distortion, or corrosion.
- g. INSPECT all approved filters and pipe plugs for damage.

NOTE: *The SWB relies on the mechanical interface of the pipe threads with a thread sealant to create a leak-tight joint.*

- h. IF a rubber gasket is supplied with the filter,
THEN REMOVE rubber gasket.

NOTE:

- *A minimum of two and up to four approved filters (e.g. NucFil-013, NucFil-019, etc.) may be installed in an SWB.*
- *A NucFil-019DS is the only filter required to be installed in an SWB.*

- i. From outside of SWB, using pipe thread sealant (Teflon tape or Loctite 222),
INSTALL approved filters in required ports.
 - 1) ENSURE at least one filter is a NucFil-019DS.
 - a) RECORD appropriate vent type (code), serial number and manufacture date on Appendix A.
- j. From outside of SWB, using pipe thread sealant,
INSTALL pipe plugs in remaining ports (ports without filters).
- k. DOCUMENT overpack inspection results on site form A-6005-605.

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NOTE: *Lifting SWBs - The packaging is designated to be lifted by several methods: Crane/hoist with adjustable lifting slings; SWB lift fixture adapter coupled to the adjustable center-of-gravity lift fixture (ACGLF); a forklift with conventional forks; or a forklift with SWB adapter. In all cases, the user shall be responsible for ensuring the method of lifting is fit and safe for the intended operation.*

4.4.2 REMOVE SWB lid as follows:

- a. ENSURE SWB lid and body serial numbers match and are aligned.
- b. SCAN SWB bar code.
- c. Using 5/16 inch hexagon wrench, REMOVE cap screws.
- d. REMOVE all pipe plugs from SWB.
- e. INSPECT threads on lid lift nut.
 - 1) IF threads have minor deformation (e.g. burrs, cross thread, etc.), THEN CORRECT thread deformation by running a 1/4-20 UNC thread tap through threads.
- f. INSERT a 1/4-20 UNC-2A X .29-inch long swivel hoist ring in lid lift nut.
- g. TORQUE swivel hoist ring bolt as required by manufacturer.
- h. ENSURE rigging capable of lifting 300 lbs is attached to swivel hoist ring.

WARNING:

Pinch points are present between lid and body shell. Fingers and other body parts are to be kept clear of these areas.

- i. LIFT lid (carefully and slowly) upward and clear of container body shell flange.

CAUTION:

Placing lid on suitable support blocking to prevent contact of lid flange with ground or floor will preclude damage to edge of lid that forms a gasket sealing surface.

- j. SET lid down in a secure place.

4.4.3 OVERPACK as follows:

- a. ENSURE all bar codes on container(s) being overpacked match.
- b. RECORD barcode of original container(s) and overpack on Appendix A.

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- c. SCAN bar code on inner container(s) being overpacked into SWB, as needed.
- d. ENTER appropriate SWB vent code
 - 1) ENSURE at least one vent code is a NucFil-019DS filter.
 - a) RECORD appropriate vent type (code), serial number and manufacture date on Appendix A.
- e. PLACE inner container bar code labels on SWB.
- f. LOAD SWB as follows:
 - 1) ENSURE steps 0 and 4.4.1 have been completed.
 - 2) IF required,
THEN PLACE appropriate liner into SWB.
 - 3) Using appropriate lifting methods,
PLACE container(s) in SWB.

NOTE: *Blocking and bracing of waste container(s) inside of an overpack container is performed per an approved Internal Securement plan (ISP) for the specific waste box.*

- 4.4.4 INSERT blocking and bracing per ISP
AND RECORD plan number on Appendix A.
- 4.4.5 INSTALL SWB Lid as follows:
 - a. VERIFY SWB lid and body serial numbers match.
 - 1) IF lid and body serial numbers do not match,
THEN NOTIFY FWS.
 - 2) RECORD on Appendix A that SWB lid and body serial numbers match.
 - b. INSPECT (visually) SWB to ensure foreign material is not inadvertently placed on sealing surfaces.
 - c. ENSURE rigging capable of lifting 300 lbs is attached to swivel hoist ring.

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WARNING:

Pinch points are present between lid and body shell. Fingers and other body parts are to be kept clear of these areas.

- d. LIFT lid into position, ensuring lid and hole alignment are correct, and that lid and body serial numbers are aligned on same side of SWB, AND LOWER onto gasket.
 - 1) RECORD on Appendix A that SWB lid and body serial numbers are aligned.

CAUTION:

The SWB lid is relatively flexible; a line-up bar may be used to pull the lid in position with the body. Care must be taken to not damage the rivet threads.

Use of power tools to quickly seat (hand-tighten) the screws is allowable. However, care should be taken to seat the screws only hand-tight and to not apply excessive torque.

- e. COVER screws with Teflon tape or Loctite 222.
 - f. INSTALL four corner screws.
 - g. INSTALL middle screws on straight sides.
 - h. INSTALL middle screws on curved ends.
 - i. INSTALL and seat all remaining screws.
 - j. IF not already complete,
THEN REMOVE lid lift rigging and hoist ring.
- 4.4.6 TORQUE SWB as follows:
- a. ENSURE QC is present to witness torquing.
- NOTE:** *Torque requirements may be attached to the container or available from the TPDA or listed in the container manufacturer's closure instructions.*
- b. TORQUE container lid and filter(s) to torque requirements.
 - c. WHEN torquing an SWB,
THEN PERFORM the following:
 - 1) TORQUE all screws to 35 ft lbs (30 to 40 ft lbs or 360 to 480 in lbs).
 - 2) TORQUE all screws to 55 ft lbs (50 to 60 ft lbs or 600 to 720 in lbs).

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- 3) TORQUE filters and plugs to 10 ft lbs (5 to 15 ft lbs or 60 to 180 in lbs).
 - 4) GO TO step 4.4.6e.
 - d. IF torque requirements are not on container,
THEN NOTIFY FWS to contact container TPDA for direction.
 - 1) TORQUE per FWS and TPDA direction.
 - e. (QC) ENSURE required torque data is recorded on Appendix A.
 - 1) SIGN Appendix A.
- 4.4.7 IF SWB is being used as a stand-alone Type A container,
THEN APPLY a tamper indicator seal or other device between lid and body flanges, as required by 49 CFR §173.412(a).

NOTE: Steps 4.4.8 and 4.4.8a may be performed out of order or concurrently.

- 4.4.8 (RCT) PERFORM radiation and contamination surveys
AND APPLY radiological survey sticker.
- a. RECORD Radiological Survey Report number on Appendix A.
- 4.4.9 WEIGH container.
- a. MARK new container gross weight on container.
 - b. ENTER gross weight on Appendix A.
- 4.4.10 UPLOAD into SWITS
AND ENSURE information has been received

NOTE:

- *If placing more than one drum in an overpack, Waste and Transportation Services must input new CPS container types based on CSR instructions, after inner containers have been scanned to the new outer container.*
- *Some containers which were previously marked fissile may not have sufficient fissile content to require fissile labels.*

- 4.4.11 IF containers were identified by FWS as possibly requiring fissile labels or previously marked fissile,
THEN PERFORM the following:
- a. PRINT fissile labels for overpack containers.
 - b. APPLY fissile label to outer container.

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- c. For Type D, E, and X containers,
APPLY unique highly visible identifiers
- 4.4.12 COMPLETE and SIGN Appendix A.
- 4.4.13 TURN IN completed Appendix A to FWS.
- 4.4.14 MOVE containers per FWS direction.

NOTE: *Blocking and bracing of waste container(s) inside of an overpack container is performed per an approved Internal Securement Plan (ISP) for the specific waste box.*

WARNING:

- All personnel must wear hearing protection within 25 ft of the vicinity of a crane, as directed by IH.
- At no time shall any personnel have any part of their body under a suspended load.

4.5 Overpack Containers into Overpack Boxes

- 4.5.1 IF storage container is DOT EMPTY,
THEN POSITION container in an area suitable for surveys, as directed by FWS.
 - If survey documentation is available that indicates that no removable contamination exists within the DOT Empty container, then the container should be placed in a posted Radiological Buffer Area as a minimum for opening and surveys.
 - If no survey documentation is available, the container should be placed, opened and surveyed within a posted Contamination Area as a minimum before opening.
- 4.5.2 IF overpacking waste container(s) into an overpack container,
THEN PERFORM the following:
 - a. OPEN overpack container.
 - b. (RCT) IF storage container is DOT EMPTY,
THEN PERFORM contamination survey.
 - c. INSPECT container
AND DOCUMENT overpack inspection results on site form A-6005-605.
 - 1) IF gasket is not installed,
THEN INSTALL gasket according to manufactures direction.

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- 2) IF gasket is damaged, deformed, deteriorated, and/or shelf life has expired,
THEN REPLACE gasket according to manufactures direction
- 3) (QA/QC) Sign the A-6005-605 form

NOTE: DOT compliant shipments do not require an ISP.

- d. For DOT compliant shipments,
OBTAIN blocking and bracing requirements from certified shipper.

NOTE: • ISPs for non-DOT compliant shipments require DOE-RL Traffic Manager approval.

- ISP document number can be found on the Transportation Safety website at <http://prc.rl.gov/rapidweb/TSO/index.cfm?PageNum=1>, Master Tie Down Analysis List.
- e. For non-DOT compliant shipments,
OBTAIN an approved ISP from certified shipper.

4.5.3 IF applicable,
THEN MARK overpack container with the same markings/labels found on inner container.

4.5.4 (RCT) PERFORM dose and contamination surveys on waste package.

4.5.5 INSPECT plastic over waste package to ensure it is in good condition, as applicable.

- a. RE-COVER waste package with plastic (20' wide) as necessary.
- b. IF waste package was re-covered with plastic,
THEN (RCT) PERFORM contamination survey on waste package.
- c. IF waste package needs further repair,
THEN STOP and NOTIFY FWS on condition.

4.5.6 RECORD barcode(s) of original container(s) and overpack box on Appendix A.

4.5.7 SCAN barcode(s) on inner container(s) being overpacked in overpack box, as needed.

4.5.8 INSTALL approved filters in all ports of overpack container.

- a. ENSURE at least one vent code is a NucFil-019DS filter.

- 1) RECORD appropriate vent type (code), serial number and manufacture date on Appendix A.

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4.5.9 ENTER appropriate vent code on Appendix A.

4.5.10 PLACE inner container bar code labels on overpack.

WARNING:

- All personnel must wear hearing protection within 25 ft of the vicinity of a crane, as directed by IH.
- At no time shall any personnel have any part of their body under a suspended load.

4.5.11 IF using crane,
THEN LIFT waste package so that there is sufficient height for radiological surveys.

4.5.12 INSPECT underside of container to ensure it is safe to move.

4.5.13 (RCT) Using a long reaching tool,
PERFORM contamination survey underneath waste package.

a. RECORD Radiological Survey Report number on Appendix A.

NOTE: Steps 4.5.14 and 4.5.15 may be performed out of order or concurrently, as directed by the ISP.

4.5.14 LOAD overpack box using appropriate lifting methods.

4.5.15 INSTALL blocking and bracing and/or tie-down per certified shipper direction or ISP, as applicable.

4.5.16 For non-DOT compliant shipments,
RECORD document number of ISP followed in Appendix A.

4.5.17 IF an ISP is not required,
THEN CHECK "NA" on Appendix A.

4.5.18 For multiple containers in a single overpack,
ENSURE correct containers have been loaded.

4.5.19 CLOSE overpack container.

NOTE: Torque requirements may be attached to the container or available from the TPDA or listed in the container manufacturer's closure instructions.

4.5.20 TORQUE container lid and filter(s) to torque requirements:

a. ENSURE QC is present to witness torquing.

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- b. IF torque requirements are not on container,
THEN NOTIFY FWS to contact container TPDA for direction.
 - 1) TORQUE per manufacturer's instructions.
- 4.5.21 (QC) ENSURE required torque data is recorded on Appendix A.
 - a. SIGN Appendix A.
- 4.5.22 (RCT) PERFORM radiological surveys as necessary
AND APPLY radiological survey sticker.
- 4.5.23 WEIGH containers
AND RECORD new gross weight on container and Appendix A.
- 4.5.24 UPLOAD information into SWITS
AND ENSURE information has been received.
- 4.5.25 IF containers were identified as possibly requiring fissile labels or previously marked fissile,
THEN PERFORM the following:
 - a. PRINT new fissile bar code labels for overpack containers.
 - b. APPLY fissile bar code label and fissile symbol to outer container.
 - 1) For Type D, E, M, and X containers, APPLY unique highly visible identifiers.
- 4.5.26 COMPLETE and SIGN Appendix A.
- 4.5.27 TURN IN associated paperwork to FWS.

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5.0 FORMS

Container Preuse Inspection (A-6005-605)

6.0 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
Overpack & Torque Data Sheet (Appendix A)	Operations Management	Facility Records
Preuse Inspection Form (A-6005-605)	Operations Management	Facility Records

7.0 SOURCES

7.1 Requirements

CHPRC-01039, *Package-Specific Safety Document for Steel Drums*
 HNF-15280, *Technical Safety Requirements*
 HNF-21239, *SWOC Fire Hazard Analysis*

7.2 References

CPS-SWOC-001, *SWOC Waste Storage, Movement, and Non-intrusive Operations*
 HNF-SD-TPSARP-004, Rev. 2, *Safety Analysis Report for Packaging (Onsite) Standard Waste Box*
 PRC-PRO-TP-156, *Onsite Hazardous Material Shipments*
 PRC-PRO-TP-19358, *Surveillance and Maintenance of Reusable Radioactive Material Packaging*
 PRC-PRO-SH-28034, *Adverse Weather*
 DOE/RL-92-36, *Hanford Hoisting and Rigging Manual*

7.3 Bases

Condition Report CR-2012-2137, Corrective Action #2

8.0 APPENDIXES

- Appendix A - Overpack & Torque Data Sheet
- Appendix B - SWB Lid Flange Sealing Gasket Installation/Replacement Instructions
- Appendix C - SWITS Barcode Scanner Supplemental Information (Page 1 of 2)
- Appendix D - List of Disposal & Storage Categories
- Appendix E - Waste Compatibility (Page 1 of 2)

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Appendix A - Overpack & Torque Data Sheet

Overpack Data Section			
Original Container CIN Number(s)			
Overpack CIN Container Number			
Overpack Inspection Results (sat/unsat)			
Container Type and size			
New Gross Weight			
SWB Lid and Body Serial numbers Match			
SWB Lid and Body Serial numbers are Aligned			
Liner Installed (yes/no, type, weight)			
Wedges or dunnage Installed (yes/no, weight)			
Absorbent or Void Fill (type, estimated weight)			
Is Overpack Vented? If So, Vent Type (code)			
Vent Serial Number	Manufacture Date	Vent Serial Number	Manufacture Date
Radiological Survey Report Number:			
Reason for overpacking			
Scale /Component I.D. Number			
Scale /Calibration Due Date			
Internal Securement Plan (ISP) Number			
Operator (print/sign/date):			
FWS (print/sign/date):			
Torque Data Section			
Container Number	Torque Applied to Container (ft-lbs)	Torque Applied to Filter/Plugs (ft-lbs)	
Torque Wrench Number:			
Torque Wrench Calibration Due Date:			
Operator (print/sign/date):			
FWS (print/sign/date):			
Torque Data Is Accurate and Correct, QC (print/sign/date):			

Submit completed data sheet to Waste & Transportation Services

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Appendix B - SWB Lid Flange Sealing Gasket Installation/Replacement Instructions

1.1 Replace/Install SWB Lid Flange Sealing Gasket

- 1.1.1 PLACE SWB lid on workbench or stand using appropriate rigging.
- 1.1.2 PERFORM the following to manually remove old gasket:
 - a. STRIP gasket from body flange.
 - b. Using a flexible spatula, putty knife, or similar tool with denatured alcohol, REMOVE any residual gasket components or adhesive.
- 1.1.3 PERFORM the following to install new gasket:
 - a. OBTAIN new gasket.
 - b. ENSURE gasket shelf life has not expired.

NOTE:

- *Minor adjustments may be made to the gasket by trimming excess material, if necessary.*
- *Gaps up to ¼ inch may be filled in accordance with Standard Waste Box Handling and Operational Manual.*

- 1.1.4 Prior to installation, ENSURE gasket holes match body holes AND mitered ends fit together properly.
- 1.1.5 PERFORM the following to install lid gasket (4 pieces):
 - a. REMOVE protective tape from pressure-sensitive adhesive back.
 - b. PLACE each piece of gasket assembly (adhesive-side down) on corresponding body frame location, ensuring mitered ends interlock.
- 1.1.6 ENSURE gasket and lid sealing surfaces are clean and free of dirt, foreign particles, or other contaminants.

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Appendix C - SWITS Barcode Scanner Supplemental Information (Page 1 of 2)

1.0 SCAN NEW CONTAINER:

1.1 POWER UP barcode scanner.

1.2 START application by double-clicking SWITS Barcode program icon.

1.3 From Main Menu, SELECT SWPO / TSD Menu.

1.4 From SWPO / TSD Menu screen, SELECT Accept New Packages.

1.5 From Accept New Packages screen, PERFORM the following:

1.5.1 At "Gen Group:" box, ENTER "SWPO" for generator group and PRESS Enter.

1.5.2 At "Facility:" box, SCAN or KEY facility that will receive new container.

1.5.3 At "Unit:" box, SCAN or KEY facility unit/quadrant that will receive new container.

a. IF there is no unit/quadrant,
THEN PRESS Enter to skip box.

1.5.4 At "[Scan Container ID:]", SCAN or KEY PIN# of each container to be received.

1.5.5 REPEAT as necessary.

1.6 WHEN finished, PRESS F4 key (blue key, along top row of keypad) to exit screen.

1.7 EXIT SWPO / TSD Menu screen by pressing F4 again.

1.8 From Main Menu, SELECT Quit to exit scanner application.

2.0 SCAN OVERPACK CONTAINER:

2.1 POWER UP barcode scanner.

2.2 START application by double-clicking SWITS Barcode program icon.

2.3 From Main Menu, SELECT SWPO / TSD Menu.

2.4 SELECT Repackage.

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Appendix C - (Cont.) **SWITS Barcode Scanner Supplemental Information (Page 2 of 2)**

- NOTE:**
- *The date cannot be in the future, relative to date first displayed on scanner.*
 - *The Repackage "Type" is automatically set to "O", for disposal overpack.*

2.5 From Repackage screen, PERFORM the following:

2.5.1 ENSURE "Date:" box is correct and PRESS Enter.

- a. IF default date is not correct,
THEN ENTER (manually) date
AND PRESS Enter.

2.5.2 SCAN or KEY PIN# of inner container (container to be overpacked).

2.5.3 SCAN or KEY PIN# of overpack container.

2.5.4 REPEAT as necessary.

2.6 UPLOAD into SWITS
AND ENSURE information has been received.

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Appendix D - List of Disposal & Storage Categories

Disposal Categories	
DDE	Direct Disposal, 200-E LLBG
DDW	Direct Disposal, 200-W LLBG
DMW	Direct Disposal, Mixed Waste Trench
SMW	Stabilization Required, Mixed Waste Trench
STE	Stabilization Required, 200-E LLBG
STW	Stabilization Required, 200-W LLBG

Storage Categories			
A [D]	Acid	N [NMW]	Other non-mixed waste
AP	Acid PCB	NP [PCB]	Other non-mixed waste PCB
B [CS]	Base (caustic)	M [OMW]	Other mixed waste
BP	Base (caustic) PCB	MP [PCB]	Other mixed waste PCB
BR	Base (caustic) cyanide/sulfide	MR	Other mixed waste cyanide/sulfide
C	Combustible	O	Oxidizer
CA [CD]	Combustible acid	OA	Oxidizer acid
CAP	Combustible acid PCB	OAP	Oxidizer acid PCB
CB	Combustible base (caustic)	OB	Oxidizer base (caustic)
CBP	Combustible base PCB	OBR	Oxidizer base (caustic) cyanide/sulfide
CBR	Combustible base (caustic) cyanide/sulfide	OBP	Oxidizer base (caustic) PCB
CP	Combustible PCB	OR	Oxidizer cyanide/sulfide
CR	Combustible cyanide/sulfide	R	Water reactive
F [FL]	Flammable ⁽³⁾	S	Special segregation ⁽¹⁾
FA [FLD]	Flammable acid ⁽³⁾	W	Alkali metal storage module ⁽²⁾
FAP	Flammable acid PCB ⁽³⁾	Z	Stored in CWC MBA 291 only
FB [FLC]	Flammable base (caustic) ⁽³⁾	ZB	Base (caustic) stored in MBA 291 only
FBP	Flammable base (caustic) PCB ⁽³⁾		
FBR	Flammable base (caustic) cyanide/sulfide ⁽³⁾		
FP	Flammable PCB ⁽³⁾		
FR	Flammable cyanide/sulfide ⁽³⁾		

(1) In accordance with instructions from ECO and operations management (Refer to specific instructions on receipt report from TSD acceptance representative)

(2) Alkali metals and related flammable solids only.

(3) Must be stored in flammable storage modules only.

(4) Only waste with a "Z" waste code is to be stored in CWC MBA 291. The Waste Compatibility table (Appendix E) should be used for help in segregating when combined with "Z" waste code (i.e., ZA, ZC, ZP).

Letters in brackets "[]" are Legacy Codes.

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Appendix E - Waste Compatibility (Page 1 of 2)

Primary Hazard - Acid (A)	May be Stored with:
A	A, AP, M, MP, N, NP
AP	A, AP, M, MP, N, NP
Primary Hazard – Base (B)	May be stored with:
B	B, BP, BR, M, MP, MR, N, NP
BR	B, BP, BR, M, MP, MR, N, NP
BP	B, BP, BR, M, MP, MR, N, NP
Primary Hazard – Combustible (C)	May be stored with:
C	C, CA, CB, CAP, CBP, CBR, CP, CR, F, FA, FP, FR, FAP, FB, FBP, FBR, M, MP, MR, N, NP
CA	C, CA, CAP, CP, F, FA, FAP, FP, M, MP, N, NP
CP	C, CA, CAP, CB, CBP, CBR, CR, F, FA, FAP, FB, FBP, FBR, FP, FR, M, MP, MR, N, NP
CR	C, CB, CBP, CBR, CP, CR, F, FB, FBP, FBR, FP, FR, M, MP, MR, N, NP
CAP	C, CA, CAP, CP, F, FA, FAP, FP, M, MP, MR, N, NP
CB	C, CB, CBP, CBR, CP, CR, F, FB, FBP, FBR, FP, FR, M, MP, MR, N, NP
CBP	C, CB, CBP, CBR, CP, CR, F, FB, FBP, FBR, FP, FR, M, MP, MR, N, NP
CBR	C, CB, CBP, CBR, CP, CR, F, FB, FBP, FBR, FP, FR, M, MP, MR, N, NP
Primary Hazard – Flammable (F)	May be stored with:
F	C, CA, CAP, CB, CBP, CP, CR, CBR, F, FA, FR, FAP, FB, FBP, FBR, FP, M, MP, MR, N, NP
FA	C, CA, CAP, CP, F, FA, FAP, FP, M, MP, N, NP
FP	C, CA, CAP, CB, CBP, CBR, CP, CR, F, FA, FR, FAP, FB, FBP, FBR, FP, M, MP, MR, N, NP
FR	C, CP, CR, CB, CBP, CBR, F, FR, FB, FBP, FBR, FP, M, MR, N, NP
FAP	C, CA, CAP, CP, F, FA, FAP, FP, M, MP, MR, N, NP
FB	C, CB, CBP, CBR, CP, CR, F, FB, FBP, FBR, FP, FR, M, MP, MR, N, NP
FBR	C, CB, CBP, CBR, CP, CR, F, FB, FBP, FBR, FP, FR, M, MP, MR, N, NP
FBP	C, CB, CBP, CBR, CP, CR, F, FB, FBP, FBR, FP, FR, M, MP, MR, N, NP
Primary Hazard – Oxidizer (O)	May be stored with:
O	O, OA, OAP, OB, OBP, OBR, OR, M, MR, MP, N, NP
OA	O, OA, OAP, M, MP, N, NP
OAP	O, OA, OAP, M, MP, N, NP
OB	O, OB, OBP, OBR, OR, M, MP, MR, N, NP
OBR	O, OB, OBP, OBR, OR, M, MP, MR, N, NP
OBP	O, OB, OBP, OBR, OR, M, MP, MR, N, NP
OR	O, OB, OBP, OBR, OR, M, MP, MR, N, NP

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Appendix E - (Cont.) **Waste Compatibility (Page 2 of 2)**

Primary Hazard – Special (R)	May be stored with:
R	R, W
Primary Hazard – Special (S)	May be stored with:
S	In accordance with instructions from ECO and operations management (Refer to specific instructions on receipt report from TSD acceptance representative)
Primary Hazard – Alkali metal (W)	May be stored with:
W	R, W
Primary Hazard - None	May be stored with:
M (other mixed waste)	A, AP, B, BR, BP, C, CA, CAP, CB, CBP, CBR, CP, CR F, FA, FAP, FB, FBP, FBR, FP, FR O, OA, OAP, OB, OBP, OBR, OR, M, MP, MR, N, NP
MR (other mixed waste cyanide/sulfide)	B, BR, BP, C, CAP, CB, CBP, CBR, CP, CR F, FAP, FB, FBP, FBR, FP, FR O, OB, OBP, OBR, OR, M, MP, MR, N, NP
MP (other mixed waste PCB)	A, AP, B, BR, BP, C, CA, CAP, CB, CBP, CBR, CP, CR F, FA, FAP, FB, FBP, FBR, FP O, OA, OAP, OB, OBP, OBR, OR, M, MP, MR, N, NP
N (other non-mixed waste)	A, AP, B, BR, BP, C, CA, CAP, CB, CBP, CBR, CP, CR F, FA, FAP, FB, FBP, FBR, FP, FR O, OA, OAP, OB, OBP, OBR, OR, M, MP, MR, N, NP
NP (other non-mixed waste PCB)	A, AP, B, BR, BP, C, CA, CAP, CB, CBP, CBR, CP, CR F, FA, FAP, FB, FBP, FBR, FP, FR O, OA, OAP, OB, OBP, OBR, OR, M, MP, MR, N, NP
Z	Z, ZB
ZB	Z, ZB

Appendix D defines waste hazard acronyms.

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

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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



Inspect CWC & Miscellaneous Buildings

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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.

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- 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.

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- 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

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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]**

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- 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

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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.

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- 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.

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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.

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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.

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- 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.

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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.

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- 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.

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- 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.

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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.

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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.

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- 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.

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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.

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- 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.

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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.

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- 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.

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- 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.

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- 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.

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- 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).

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- 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.

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- 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.

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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.

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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 Records
Facility Logbook	Operations Management	
Monthly SWOC ACMP Container Surveillance Sheet	Operations Management	ACMP Manager

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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*

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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 <u>not</u> 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.

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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 <u>Not</u> Present				
Roof <u>Not</u> Leaking				
Wind Damage <u>Not</u> Present				
Suspicious Objects or Packages <u>Not</u> Present				
Building/Module Secured				
C. Tank/Drum Condition	Yes	No	Yes	No
Leaks <u>Not</u> 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.

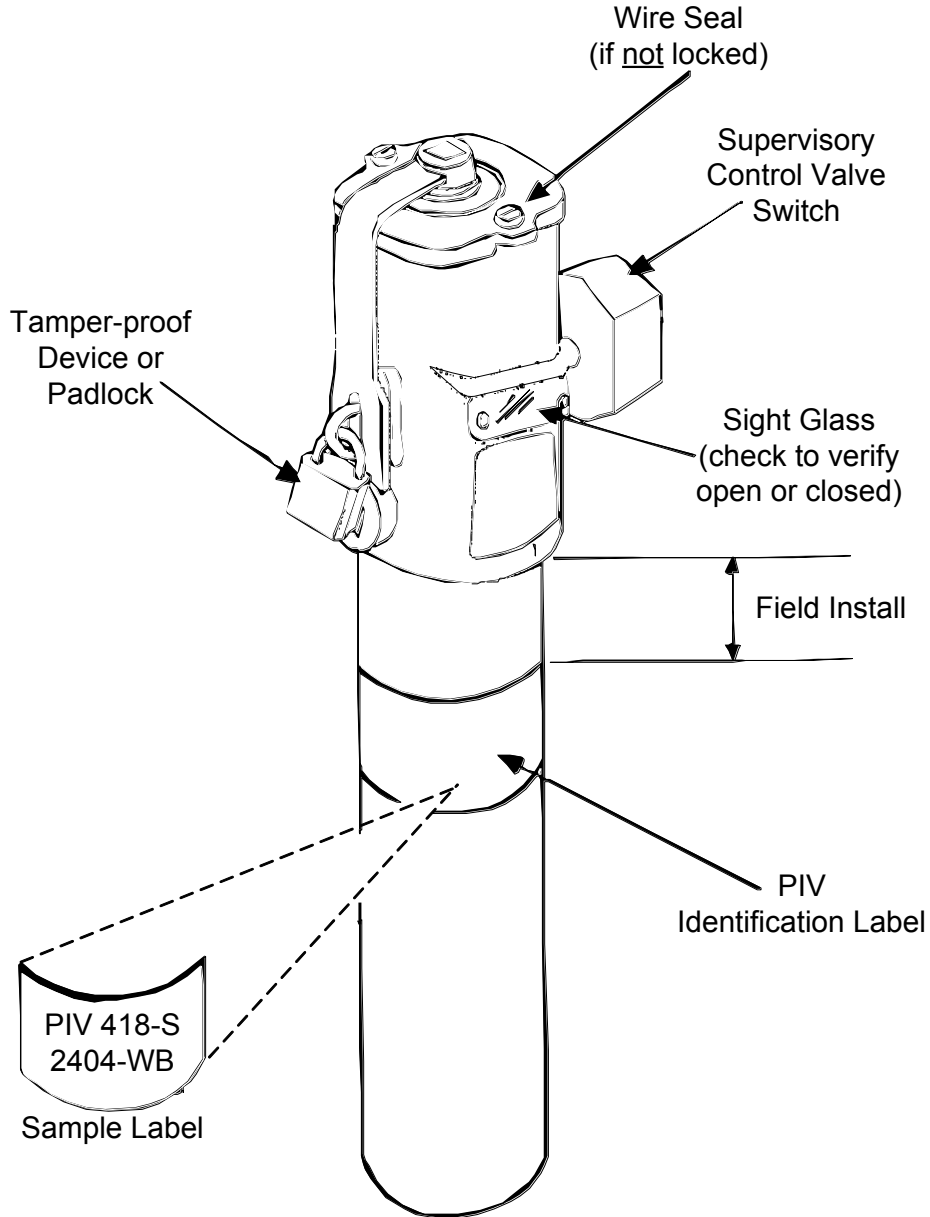
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Appendix D - Typical Post Indicator Valve Diagram



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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]

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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 <i>If less than minimum pressure (94 psi), notify SDO to place facility in Standby mode per WMP-342, Section 4.1.</i>		Yes / No	Yes / No
⁽²⁾ 286W-WATER-SW-GAGE-2 <i>If less than minimum pressure (88 psi), notify SDO to place facility in Standby mode per WMP-342, Section 4.1.</i>		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.

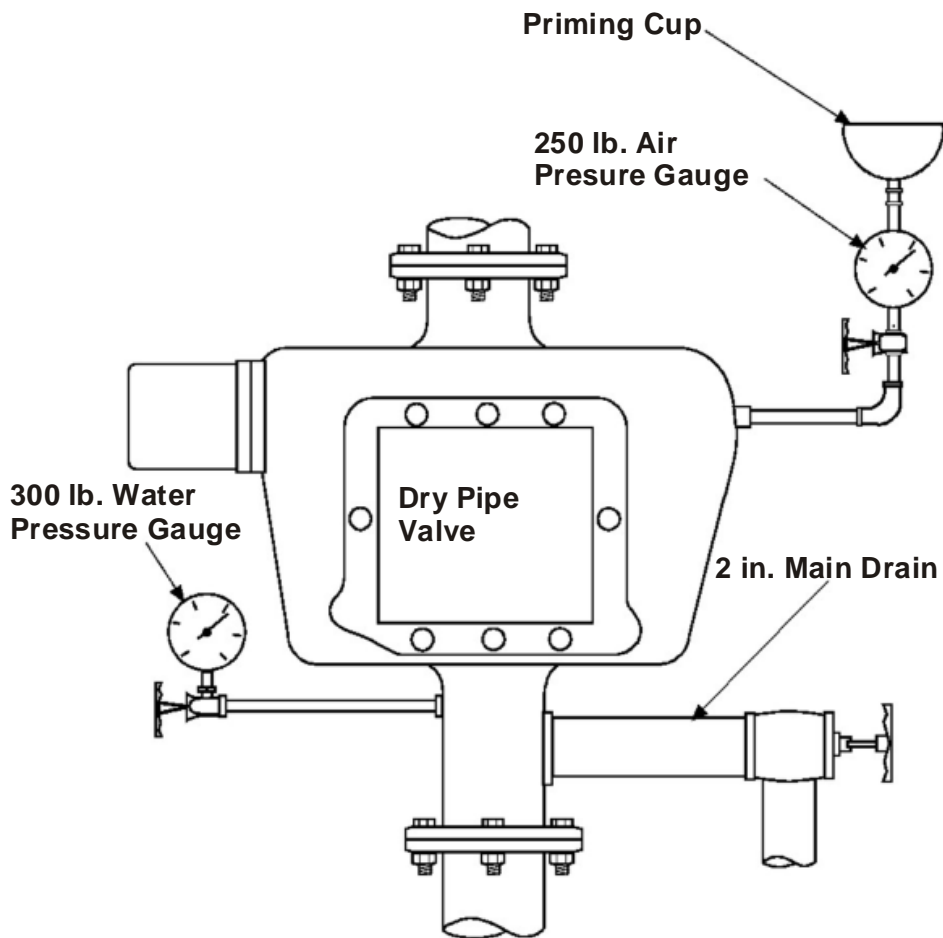
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Appendix F - Fire System Water & Air Pressure Gauge Diagram



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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 <u>not</u> 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):				

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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.

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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):					

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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):					

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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):				

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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.

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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.

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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.

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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.

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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.

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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.

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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.

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

Month:	
Inspection: <input type="checkbox"/> Monthly <input type="checkbox"/> 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):	
<input type="checkbox"/> 2401-W (Outside Storage Building Southwest Corner)	<input type="checkbox"/> 2404-WA
<input type="checkbox"/> 2402-W (Along Center Roadway)	<input type="checkbox"/> Waste Receiving & Staging Area
<input type="checkbox"/> 2402-WL (Along Center Roadway)	<input type="checkbox"/> 2402-WD (Drum Kit Near)
<input type="checkbox"/> 2403-WA (Outside East Entrance)	<input type="checkbox"/> 2402-WH (Drum Kit Near)
	<input type="checkbox"/> Other:
Seal is Intact/Initialed/Dated (check one): <input type="checkbox"/> Yes <input type="checkbox"/> 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)	
<i>Additional tools/supplies may be obtained as needed.</i>	
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):	

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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):					

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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):	

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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):			

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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)	
	Yes	No	Yes	No	Yes	No	Yes	No
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):								

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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):			

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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.

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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? <i>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."</i>		
CWC Key 1.3.2.1, 2, 10, & 11	2	Are there any combustible containers stored inside the building? <i>Note: Building 2404WA may store up to 10 wooden boxes, under certain conditions.</i>		
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 3 rd tier drums <u>not</u> banded?		
SWOC Key 1.3.1.9	5	Are there any containers coated with polyurea <u>not</u> on metal pallets?		
SWOC Key 1.3.1.10	6	Are there any drums stored on the 2 nd or 3 rd tier <u>not</u> 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 \geq 6 ft tall 2) 35 ft if box is \geq 8 ft tall 3) 66 ft if box is \geq 11 ft tall 4) 71 ft if box is \geq 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."

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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 <u>not</u> identifiable by PIN/CIN, seal number, and does <u>not</u> 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 <u>not</u> 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 <u>not</u> 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 <u>not</u> fully meet the waste acceptance criteria (HNF-EP-0063) [TSR 5.7.8] [TSR 5.7.9.c]	Waste containers that do <u>not</u> 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.