


**Attachment 20 to**

**GNRO-2012/00039**

**ER Reference - Entergy. 2008b. Entergy Nuclear Fleet Procedure EN-EV-106,  
Waste Management Program, Revision 2. August 18, 2008**

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Procedure Contains NMM REFLIB Forms: YES ☒ NO ☐

<b>Effective Date</b> 8/18/08	<b>Procedure Owner:</b> <b>Title:</b> <b>Site:</b>	George Crowley Effluent & Env. Spec. Vermont Yankee	<b>Governance Owner:</b> <b>Title:</b> <b>Site:</b>	Rick Buckley Mgr. Fleet Env. Prot. Echelon
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Exception Date*	Site	Site Procedure Champion	Title
	ANO	Dennis Calloway	
NA	BRP	NA	
	GGNS	John Lassetter	
10/15/08	IPEC	Dara Gray	
	JAF	Andy Marks	
	PLP	Joe Hager	
	PNPS	Joe Egan	
10/15/08	RBS	Bill Spell	
	VY	George Crowley	
	W3	Brian Falgoust	
NA	NP	NA	
NA	HQN	NA	

**Site and NMM Procedures Canceled or Superseded By This Revision**

ENN-EV-113 (Drum Control Program Guidelines) and ENS-EV-113 (Drum Control Program)

**Process Applicability Exclusion:** All Sites: ☒

Specific Sites: ANO ☐ BRP ☐ GGNS ☐ IPEC ☐ JAF ☐ PLP ☐ PNPS ☐ RBS ☐ VY ☐ W3 ☐ NP ☐


**Change Statement**

**Revision 2:**

- Incorporates information from the regional drum control procedures (EV-113) into Sections 5.1, 5.9, 5.15 and Attachment 9.9.
- Changed drum to container throughout procedure.
- Editorial changes made to Sections 2.0, 3.0, 4.0, 5.9, 5.11, 5.12, 5.13, 5.14 and 5.15.
- Added four additional references to Section 2.0 and deleted reference to EV-113.
- Adds three additional definitions to Section 3.0.
- Added requirement to periodically inspect universal waste areas in Sections 5.11, 5.12, 5.12 and 5.14.
- Specifies that records are to be maintained in accordance with EN-AD-103.
- Incorporates changes identified in CA3 to CR-HQN-2007-992 regarding record retention requirements in Sections 2.0, 5.20 and 7.1.
- Incorporates typographical errors identified in CR-GGN-2008-880 in Section 2.0.


\*Requires justification for the exception:

IPEC and RBS is taking an exception to allow transition of the drum control practices outlined in ENN-EV-113 and ENS-EV-113 to those now described in EN-EV-106.

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## 1.0 **PURPOSE**

- [1] The purpose of this procedure is to outline requirements for onsite waste management, transportation and disposal of nonradioactive hazardous and nonhazardous wastes, and low-level mixed wastes at the Entergy Nuclear sites in accordance with applicable state and federal regulations.


## 2.0 **REFERENCES**

### [1] Nuclear Management Manual References

- (a) EN-AD-103, Document Control and Records Management Program
- (b) EN-EV-104, Waste Minimization
- (c) EN-EV-112, Chemical Control Program
- (d) EN-EV-120, Polychlorinated Biphenyl Management Program
- (e) EN-RW-101, Radioactive Waste Management
- (f) EN-RW-102, Radioactive Shipping Procedure
- (g) EN-RW-106, Integrated Transportation Security Plan

### [2] Regulatory References

- (a) Atomic Energy Act of 1954
- (b) EPRI documents may be referenced for additional information or guidance as it relates to mixed hazardous/radioactive waste management
- (c) Resource Conservation and Recovery Act (RCRA)
- (d) "Test Methods for Evaluating Solid Waste, Physical Chemical Methods," EPA Publication No. SW-846, Third Edition
- (e) 10CFR20, "Standards for Protection Against Radiation"
- (f) 29CFR1910.120, "OSHA Hazardous Waste Operations and Emergency Response"

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- (g) 29CFR1910.1200, "Hazard Communication"
- (h) 40CFR261, "Environmental Protection Agency (EPA) Regulations for Identifying Hazardous Waste"
- (i) 40CFR262, "EPA Regulations for Hazardous Waste Generators"
- (j) 40CFR263, "EPA Regulations For Hazardous Waste Transporters"
- (k) 40CFR265, "EPA Regulations for Interim Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage and Disposal Facilities"
- (l) 40CFR266, Subpart N, Conditional Exemption for Low-Level Mixed Waste Storage and Disposal
- (m) 40CFR268, "EPA Regulations on Land Disposal Facilities"
- (n) 40CFR273, "EPA Regulations for Universal Waste Management"
- (o) 40CFR279, "EPA Standards for Managing Used Oil"
- (p) 40CFR761, Toxic Substance Control Act
- (q) 49CFR100 - 199, "Transportation"

[3] ANO References


- (a) ADEQ Regulation No. 23, Hazardous Waste Management
- (b) OCNA119311, NRC Inspection Report 50-313/93-030; 50-368/93-030. Disposing of Licensed Material Contained in Waste

[4] GGNS References

- (a) MDEQ Regulation HW-1, Hazardous Waste Management Regulations

[5] IPEC and JAF References

- (a) IP2 Mixed Waste TSDF Permits
- (b) JAF Mixed Waste TSDF Permits

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- (c) 6NYCRR Part 364, Waste Transporter Permits
- (d) 6NYCRR Part 370, Hazardous Waste Management System - General
- (e) 6NYCRR Part 371, Identification and Listing of Hazardous Waste
- (f) 6NYCRR Part 372, Hazardous Waste Manifest System and Related Standards for Generators, Transporters and Facilities
- (g) 6NYCRR Part 373, Hazardous Waste Treatment, Storage and Disposal Facility Permitting Requirements
- (h) 6NYCRR Part 374, Management of Specific Hazardous Waste
- (i) 6NYCRR Part 376, Land Disposal Restrictions

[6] PLP References

- (a) Michigan Publics Acts: Act 451 Hazardous Waste Management
- (b) Palisades Administrative Procedure 1.06, "RCRA Contingency Plan"
- (c) Palisades Health Physics work Instruction WI-RSD-R-005, "Mixed Low Level Waste Management Plan"
- (d) Palisades Site: Hazardous Material Transportation Security Plan
- (e) Palisades Site: Hazardous Material Transportations Security Plan Risk Assessment
- (f) Natural Resources and Environmental Protection Act, Public Act 451, part III, "Hazardous Waste Management," Michigan Compiled Laws Annotated (MCLA) 324.11101 through 324.11152
- (g) Michigan Motor Carrier Safety Act, Act 181 of the Public Acts of 1963, as amended in 1984

[7] PNPS References

- (a) 310 CMR 30.00, Hazardous Waste Regulations

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[8] RBS & W3 Reference

- (a) LAC 33, Part VII, Subpart 1, Solid Waste Regulations
- (b) LAC 33, Part VII, Subpart 2, Recycling
- (c) LAC 33, Part V, Chapter 11, Generators
- (d) LAC 33, Part V, Chapter 21, Containers
- (e) LAC 33, Part V, Chapter 22, Prohibitions on Land Disposal
- (f) LAC 33, Part V, Chapter 38, Universal Wastes
- (g) LAC 33, Part V, Chapter 40, Used Oil
- (h) LAC 33, Part V, Chapter 42, Conditional Exemption for Low-level Mixed Waste Storage and Disposal
- (i) LAC 33, Part V, Chapter 49, Lists of Hazardous Wastes

[9] VYNPS References

- (a) Vermont Code 12 032 001, Subchapter 1, General Provisions
- (b) Vermont Code 12 032 001, Subchapter 2, Identification and Listing of Hazardous Waste
- (c) Vermont Code 12 032 001, Subchapter 3, Hazardous Waste Generator Standards
- (d) Vermont Code 12 032 001, Subchapter 6, Standards for Hazardous Wastes that are Recycled
- (e) Vermont Code 12 032 001, Subchapter 7, Manifest, Reporting and Recordkeeping Requirements
- (f) Vermont Code 12 032 001, Subchapter 8, Used Oil Management Standards
- (g) Vermont Code 12 032 001, Subchapter 9, Universal Waste Management Standards




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### 3.0 DEFINITIONS

#### [1] ACRONYMS

- (a) ANO - Arkansas Nuclear One
- (b) DOT - Department of Transportation
- (c) EPA - Environmental Protection Agency
- (d) GGNS – Grand Gulf Nuclear Station
- (e) IPEC – Indian Point Energy Center
- (f) JAF – James A. FitzPatrick
- (g) MSDS - Material Safety Data Sheet
- (h) NYSDEC – New York State Department of Environmental Conservation
- (i) NRC - Nuclear Regulatory Commission
- (j) OSHA – Occupational Safety and Health Administration
- (k) PCB – Polychlorinated Biphenyl
- (l) PLP - Palisades
- (m) PNPS – Pilgrim Nuclear Power Station
- (n) RBS – River Bend Station
- (o) RCRA - Resource Conservation and Recovery Act
- (p) SPCC – Spill Prevention, Control and Countermeasures
- (q) TSDF - Treatment, Storage and/or Disposal Facility
- (r) VYNPS – Vermont Yankee Nuclear Power Station
- (s) W3 – Waterford 3

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[2] TERMS

- (a) Acute Hazardous Wastes - hazardous wastes indicated by the letter (H) in 40CFR261.31 and those listed in 40CFR261.33.
- (b) Accumulation/Shipping Area - designated area where wastes may be accumulated prior to offsite shipment.

**NOTE**


Container sizes are generally within a 5 to 119 gallon range.

- (c) Container – any portable metal or fiber container (includes plastic), in which a material is accumulated, transported, treated, disposed or otherwise handled.
- (d) Corrosivity (D002) - solid wastes such as acids, bases, cleaning solutions, and demineralizer regenerants, exhibiting any of the following properties:
  - (1) Is aqueous and has a pH less than 2.0 or greater than 12.5, or
  - (2) Is liquid and corrodes steel at a rate greater than 1/4 inch per year at a test temperature of 55° C (130° F).
- (e) Electronic Devices or Items – also known as consumer electronics and includes but is not limited to devices or items such as an intact or broken cathode ray tube, (e.g., television, computer monitor, or other cathode ray tube monitor or display device), personal computer or computer component, audio and/or stereo player, videocassette recorder/player, digital videodisk (DVD) recorder/player, video camera, telephone, facsimile or copying machine, wireless paging device, or video game console, scanners, printers and radios.
- (f) Empty Container –
  - (1) Container or an inner liner (removed from a container) that has held any hazardous waste, except a compressed gas or an acute hazardous waste, is empty if it meets any of the following criteria:
    - All wastes have been removed, to the extent possible, using normal methods or practices such as pouring, pumping and aspirating, and

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- No more than one-inch of residue remains on the container bottom or inner liner, or
  - No more than 3% by weight of the total capacity of the container remains in the container or inner liner if the container is less than or equal to 119 gallons in size, or
  - No more than 0.3 percent by weight of the total capacity of the container remains in the container or inner liner if the container is greater than 119 gallons in size.
- (2) Container or an inner liner (removed from a container) that has held an acute hazardous waste is empty if it meets any of the following criteria:
- Container or inner liner has been tripled rinse using a solvent capable of removing the commercial chemical product or manufacturing chemical intermediate.
  - Container or inner liner has been cleaned by another method that has been shown in the scientific literature or by tests conducted by the generator, to achieve removal of waste product equivalent to triple rinsing.
  - In the case of a container, inner liner that prevented contact of the commercial chemical product or manufacturing chemical intermediate with the container has been removed.
- (3) Container that held a compressed gas is empty when the pressure in the container is at atmospheric pressure.
- (g) EPA Designated Large Quantity Generator - generator that meets any of the following criteria:
- (1) Generated 1,000 kg (2,205 lbs) or more of hazardous and/or mixed hazardous/radioactive wastes during the calendar month.
  - (2) Generated or accumulated 1 kg (2.2 lbs) or more of acute hazardous and/or mixed acute hazardous/radioactive wastes during the calendar month.
  - (3) Quantity of hazardous waste accumulated on-site at any time exceeds 6000 kg (13,230 lbs).

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- (h) EPA Designated Small Quantity Generator - generator that meets all of the following criteria:
- (1) Generated more than 100 kg (220 lbs) of hazardous and/or mixed hazardous/radioactive wastes but less than 1,000 kg (2,205 lbs) during the calendar month.
  - (2) Generated less than 1 kg (2.2 lbs) of acute hazardous and/or mixed acute hazardous/radioactive wastes during the calendar month.
  - (3) Quantity of hazardous waste accumulated on-site never exceeds 6000 kg (13,230 lbs) at any time.
  - (4) Wastes are accumulated in tanks or containers in a manner consistent with regulatory provisions.
- (i) Generator Category - category in which a generator is placed based on amount of hazardous and/or mixed hazardous/radioactive wastes generated per calendar month. Allowable on-site accumulation limits based on EPA generator status is as follows:
- (1) Small Quantity Generator – 180 days or 270 days if waste has to be transported 200 miles or more to a TSDF.
  - (2) Large Quantity Generator – 90 days.
- (j) Hazardous Waste - waste that is not excluded from regulation in 40CFR261 or state specific regulations and meets any of the following criteria:
- (1) Listed as a hazardous waste in 40CFR261, Subpart D or state specific regulations.
    - Mixture containing one or more hazardous wastes listed in 40CFR261, Subpart D or state specific regulations.
    - Exhibits one or more of the characteristics as defined in 40CFR261, Subpart C (ignitable, corrosive, reactive or toxic) or state specific regulations.

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- (k) Ignitability (D001) - solid wastes such as paint thinner, mineral spirits and select aromatic solvents, exhibiting any of the following properties:
- (1) Is a liquid and has a flash point less than 60° C (140° F) with exception of an aqueous solution containing less than 24 percent alcohol.
  - (2) Not a liquid and capable under normal conditions of spontaneous and sustained combustion.
  - (3) Is an ignitable compressed gas or oxidizer per DOT regulations.

**NOTE**

Industrial solid waste definition is only applicable to RBS and W3.

- (l) Industrial Solid Waste – nonhazardous solid waste generated from electric power generation processes or that is contaminated by solid waste generated by such a process. Examples of industrial solid waste are as follows:
- Spent powdered resin
  - Spent ion exchange resin
  - Oil sludge/oil soaked materials (Oily Waste)
  - Activated carbon
  - Insulating material non-leaded RTV & Iron Type
  - Used oil filters
  - Regulated medical waste
  - Non-friable asbestos products
  - Used cross ties


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**NOTE**

Large Quantity Handlers of universal wastes must maintain records of universal waste shipments.

- (m) Large Quantity Handler of Universal Waste - universal waste handler who accumulates 5,000 kilograms (11,025 pounds) or more total of universal wastes (batteries, pesticides, mercury-containing equipment, lamps, or other state designated wastes calculated collectively) at any time. The designation as a large quantity handler of universal waste is retained through the end of the calendar year in which the 5,000 kilogram limit is met or exceeded.
- (n) Low-Level Radioactive Waste - radioactive waste not classified as:
  - (1) High-level radioactive waste.
  - (2) Transuranic radioactive waste.
  - (3) Spent nuclear fuel.
  - (4) By-product materials, as defined in Section 11.e(2) of the Atomic Energy Act of 1954.
- (o) Materials In Process - material which:
  - (1) Is in the process of being evaluated/tested to determine hazardous or nonhazardous properties.
  - (2) Is being evaluated for reuse.
  - (3) Can be reused or returned to the original process.
- (p) Mixed Hazardous/Radioactive Waste - waste that satisfies the definition of low-level radioactive waste as defined in the Atomic Energy Act of 1954 and its amendments and contains hazardous waste that either:
  - (1) Is listed as a hazardous waste in 40CFR261, Subpart D or state-specific regulations, or
  - (2) Causes low-level radioactive waste to exhibit any of the characteristics identified in 40CFR261, Subpart C or state-specific regulations.

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- (q) Point of Generation - location where the waste is generated or the site designated for the waste container that is near the point of generation.

**CAUTION**

Although PCB waste may be assigned a state-specific hazardous waste code, NMM Procedure EN-EV-120 (Polychlorinated Biphenyl Management Program) must also be followed when managing PCB wastes.

- (r) Polychlorinated Biphenyl (PCB) Waste - New York State Regulated Wastes (B001 – B007), Vermont Regulated Wastes (VT01) and Massachusetts Regulated Wastes (MA 02) that contain 50 parts per million (ppm) or more of PCBs or have been contaminated by such materials are classified as hazardous wastes.
- (s) Reactivity (D003) - solid waste such as cyanides, hydrazine and peroxides, exhibiting any of the following properties:
- (1) Is normally unstable and readily undergoes violent change without detonating,
  - (2) Reacts violently with water,
  - (3) Forms potentially explosive mixture with water,
  - (4) When mixed with water, generates toxic gases, vapors or fumes,
  - (5) Contains cyanide or sulfide and generates toxic gases, vapors or fumes at pH between 2.0 and 12.5,
  - (6) Is capable of detonation, if heated under confinement or subjected to a strong initiating source, or
  - (7) Is listed by DOT as a forbidden explosive, Class A explosive or Class B explosive.
- (t) Satellite Accumulation Area - designated area near the point of generation where hazardous or mixed hazardous/radioactive waste are collected in a container.

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- (u) Small Quantity Handler of Universal Waste - universal waste handler who does not accumulate 5,000 kilograms (11,025 pounds) or more of universal wastes (batteries, pesticides, mercury-containing equipment, lamps, or other state designated wastes calculated collectively) at any time.
- (v) Solid Waste - may be a liquid, semisolid or gaseous material and includes garbage, refuse, sludge, liquids and other waste material. "Other waste material" is defined as materials which:
  - (1) Are discarded (abandoned, recycled or considered inherently waste-like), stored or accumulated for that purpose.
  - (2) Have served their original intended purpose.
  - (3) Are incidentally generated during manufacturing or mining operations.
- (w) Toxic (D004 - D043) - solid wastes such as heavy metals, organic compounds and pesticides, where the extract from a representative sample of the waste contains concentrations equal to or greater than those listed in 40CFR261.24.
- (x) Treatment, Storage, Disposal Facility (TSDF) – facility permitted to treat, store and/or dispose of hazardous wastes pursuant to 40CFR264, and state specific regulations.


**CAUTION**

Fluorescent lighting ballasts and cathode ray tubes may be classified as universal wastes at VYNPS. However, since the requirements of 40CFR761 also applies to lighting ballasts containing PCBs, NMM Procedure EN-EV-120 (Polychlorinated Biphenyl Management Program) must also be followed when managing fluorescent lighting ballasts containing PCBs.

For IPEC, JAF and PLP, all fluorescent and incandescent lamps (including low mercury lamps) must be managed as universal waste.


- (y) Universal Wastes – hazardous wastes that are subject to the universal waste requirements such as batteries, pesticides, mercury-containing equipment, lamps and other designated state-specific wastes.



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#### 4.0 **RESPONSIBILITIES**

- [1] Environmental Focus Group - is responsible for the maintenance and interpretation of this procedure and any deviations.
- [2] Environmental Site Representatives or Designee - are responsible for activities relating to hazardous and nonhazardous waste management as follows:
  - (a) Coordination and control of administrative activities.
  - (b) Monitoring and reporting activities.
  - (c) Storage, accumulation and satellite accumulation areas under their control.
  - (d) Management and shipment of nonradiological wastes, including associated contracts.
  - (e) .Maintaining operator logs or equivalent as applicable to each site.
- [3] Radiation Protection Managers - are responsible for activities relating to mixed hazardous/radioactive waste management as follows:
  - (a) Coordination and control of administrative activities.
  - (b) Monitoring and reporting activities.
  - (c) Mixed hazardous/radioactive waste and material-in-process areas under their control.
  - (d) Management and shipment of mixed hazardous/radioactive waste as it relates to the radiological aspects, including associated contracts.
- [4] Training - is responsible for training employees in accordance with Worker Protection and Training requirements specified in Section 5.17.
- [5] Contract Managers - are responsible for ensuring that contractors are trained in accordance with the requirements of this procedure.
- [6] Employees, Contractors and their Supervision - are responsible for ensuring that the requirements of this procedure are adhered to as written.

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## 5.0 DETAILS


### 5.1 PRECAUTIONS AND LIMITATIONS

- [1] **IF** any listed hazardous or mixed hazardous/radioactive waste is commingled with nonhazardous waste, **THEN** the entire mixture becomes hazardous or mixed hazardous/radioactive waste.
- [2] **IF** there is uncertainty as to the waste categorization, **THEN** contact the Environmental Site Representative for proper determination.
- [3] **IF** in doubt about a waste compatibility with another waste, **THEN** contact the Environmental Site Representative prior to mixing the materials.
- [4] Improper mixing of waste materials may result in hazardous conditions that could result in personnel injury or property damage, or substantially increase waste disposal cost.
- [5] All "in-use" containers established for satellite accumulation purposes are required to be at or near the point of generation, unless otherwise specified by the Environmental Site Representative.

#### **NOTE**

The NRC commitment described in Section 5.1[6] below is referring to ANO only.

- [6] All material contained in a site issued container, meant for processing off-site, shall be checked for any radiological content (NRC Commitment P-13159 (OCNA119311)).
- [7] Any unauthorized use or disposal of a waste container or its' contents could result in EPA or state regulatory agency violations or fines.
- [8] Radioactive and hazardous waste shall not be mixed.
- [9] Site Environmental Department Representative shall be notified of abandoned or unidentified containers found outside any Radiologically Controlled Area.
- [10] Radiation Protection shall be notified of abandoned or unidentified containers found inside any Radiologically Controlled Area.
- [11] If a waste container is stored in an upright position, ensure that the closures are snug on the containers, to exclude rainwater or other intrusions.

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[12] Even though PCB waste may be classified as a hazardous waste and/or universal waste from state-to-state, the management of this waste must also meet the requirements of 40CFR761, which are contained in NMM Procedure EN-EV-120.


[13] At IP2, IP3 and JAF, the following specific precautions and limitations apply:

- (a) The total volume of liquid hazardous waste (aside from mixed waste) stored in containers at IP2, IP3 or JAF cannot exceed 8,800 gallons each. [6NYCRR373.1.1(d)(1)(iii)(a)]
- (b) The volume of mixed waste stored in containers at IP2 cannot exceed 5,225 gallons. [IP2 Mixed Waste Permit Conditions]
  - 1,650 gallons in each of the two (2) Mixed Waste Container Storage Cargo Units, consisting of thirty (30) 55-gallon or smaller volume containers, and
  - 1,925 gallons in the Mixed Waste Containers Storage Room.
- (c) At IP2, all mixed wastes containing free liquids and stored in containers must be overpacked to meet secondary containment requirements. [IP2 Mixed Waste Permit Conditions.]
- (d) At JAF, the volume of mixed waste stored in containers cannot exceed 2,200 gallons. [JAF Mixed Waste Permit Conditions]
  - Twenty 55-gallon containers in each of two Mixed Waste Storage Sheds.

## 5.2 WASTE MINIMIZATION

[1] Site departments are to:

- (a) Minimize waste generation to the extent feasible.
- (b) Treat, accumulate or dispose of generated waste in a manner that minimizes present and future threat to human health and environment.
- (c) Verify that the following waste minimization hierarchy options are considered for sources generating waste:
  - First - Source Reduction


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- Second - Reuse/Sound Environmental Recycling
  - Third - Treatment to Reduce Volume and/or Toxicity
  - Fourth – Disposal
- (d) Incorporate the following waste minimization techniques into work activities:
- Substitute nonhazardous chemicals or alter the operation or application to prevent the generation of hazardous or mixed hazardous/radioactive waste.
  - Employ elementary neutralization, where appropriate, to neutralize wastes considered hazardous solely because they exhibit the corrosivity characteristic.
  - Where practicable, accumulate chemicals in areas that will permit recovery and reuse of spills or leaks.
  - Segregate wastes, to the extent practicable, to reduce volume.
- (e) Be responsible for incurring waste disposal costs, when feasible.

### 5.3 WASTE DETERMINATION

- [1] Environmental Site Representative and/or Radiation Protection are to:
- (a) Verify that sources generating wastes are characterized as hazardous, mixed hazardous/radioactive or nonhazardous either by:
- Collecting a sample for radiological and nonradiological analytical testing using the guidance in Section 5.4 of this procedure, or
  - Process knowledge using a MSDS or knowledge of the process.
- (b) Document waste determinations.
- (c) Proceed to Section 5.5 of this procedure.

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#### 5.4 WASTE SAMPLING


[1] Environmental Site Representative and/or Radiation Protection are to verify that:

- (a) The sampling instructions described in Attachment 9.1 are followed when sampling waste streams for hazardous waste determination.
- (b) Samples are tested in accordance with the EPA analytical methods specified in SW-846, or an equivalent.
- (c) A Chain of Custody form accompanies waste samples submitted to an offsite commercial laboratory.
- (d) The Chain of Custody form contains the following information:
  - Type of material or identification number for material.
  - Sampling date and time.
  - Name of individual who collected the sample.
  - Sampling location/facility.
  - Sample collection technique (grab or composite).
- (e) Waste stream analyses are periodically reviewed to verify that the characteristics of the waste have not changed.
- (f) Records (or equivalent) of analyses are maintained on file.

#### 5.5 RADIOACTIVE WASTE DETERMINATION

[1] Environmental Site Representative and/or Radiation Protection, upon receiving wastes, are to:

- (a) Determine if the waste is radioactive by analytical testing or process knowledge.
- (b) Document as radioactive or nonradioactive and attach analytical results or basis for process knowledge.
- (c) Proceed to Section 5.6 of this procedure.


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## 5.6 EXCLUDED WASTE DETERMINATION

- [1] Environmental Site Representative and/or Radiation Protection, after the waste has been declared radioactive or nonradioactive, are to:
- (a) Determine if the waste meets any of the following:
    - Solid or hazardous waste exclusions listed in 40CFR261.4 or state specific regulations.
    - Universal wastes as described in 40CFR273 or state specific regulations.
    - Used oil criteria as described in 40CFR279 or state specific regulations.
  - (b) Proceed to Section 5.7 of this procedure, **IF** the waste does not meet the above criteria.
  - (c) Proceed to Section 5.8 of this procedure, **IF** the waste does meet the above criteria.

## 5.7 HAZARDOUS WASTE DETERMINATION

- [1] Environmental Site Representative and/or Radiation Protection, for waste not meeting the criteria in Section 5.6 of this procedure, are to:
- (a) Determine if waste exhibits any of the following RCRA characteristics:
    - Ignitability
    - Reactivity
    - Corrosivity
    - Toxicity
  - (b) Determine if the waste is listed in 40CFR261, Subpart D or state specific regulations as shown below:
    - “F” listed wastes from nonspecific sources.
    - “K” listed wastes from specific sources.
    - “P” and “U” listed wastes from discarded commercial chemicals.

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- (c) Document waste as hazardous if it exhibits a RCRA characteristic and/or is a listed waste.
- (d) Determine if the waste is listed in applicable state hazardous waste regulations.
- (e) Document waste as nonhazardous if it does not exhibit a RCRA characteristic and is not a listed waste.
- (f) Attach analytical results or basis for process knowledge to documentation.
- (g) Proceed to Section 5.8 of this procedure.

## 5.8 FINAL WASTE CLASSIFICATION

[1] Environmental Site Representative and/or Radiation Protection, upon classifying wastes are to:

- (a) Manage as radioactive in accordance with plant procedures if the waste is radioactive but nonhazardous.
- (b) Manage as mixed hazardous/radioactive in accordance with Section 5.9 of this procedure if the waste is radioactive and hazardous, or Section 5.10 of this procedure as applicable to each site.
- (c) Manage as hazardous in accordance with Section 5.9 of this procedure if the waste is hazardous but nonradioactive.
- (d) Manage as a universal waste in accordance with Section 5.11 of this procedure if the waste is hazardous and is nonradioactive, and is listed as a universal waste.
- (e) Manage as nonhazardous in accordance with Section 5.15 of this procedure if the waste is neither radioactive nor hazardous.
- (f) Document final waste classification.
- (g) Maintain waste determinations on file.

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## 5.9 HAZARDOUS AND MIXED HAZARDOUS/RADIOACTIVE WASTE MANAGEMENT

### NOTE

All departments placing waste in a container must ensure that the container is properly labeled so that the waste can be appropriately characterized and managed. An acceptable sample label for affixing on a container is shown in Attachment 9.9.

- [1] Departments generating hazardous waste or mixed hazardous/radioactive waste are to verify that:


- (a) Personnel are trained in accordance with Section 5.17 of this procedure prior to handling and managing the wastes, as applicable to their responsibility associated with this program.

### NOTE

For satellite accumulation areas established by the Site Environmental Representative, Steps 5.9[1](b) and 5.9[1](d) below do not apply.

- (b) Attachment 9.2 is completed and forwarded to Environmental Site Representative and/or Radiation Protection for approval prior to establishing a satellite accumulation area for collection of generated wastes.
  - (c) Satellite accumulation areas are managed in accordance with Attachment 9.3.
  - (d) Environmental Site Representative and/or Radiation Protection are notified prior to moving containers to a waste accumulation/shipping area.
- [2] Environmental Site Representative and/or Radiation Protection are to verify that:
- (a) Appropriate personnel within their departments are trained in accordance with Section 5.17 of this procedure prior to handling and managing wastes, as applicable to their responsibility associated with this program.
  - (b) Control measures are in place to manage hazardous and mixed hazardous/radioactive wastes.



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**NOTE**


At IPEC, JAF, PLP, PNPS and VYNPS, inspection of satellite accumulation areas must occur on a weekly frequency.

- (c) Periodic inspections are performed at hazardous and mixed hazardous/radioactive satellite accumulation areas, utilizing an inspection form similar to that shown in Attachment 9.4.
- (d) Waste accumulation/shipping areas meet the requirements shown in Attachment 9.5.

**NOTE**

At VYNPS, daily (during work week) inspections are to be conducted at accumulation/shipping areas (short-term storage area).

- (e) Weekly inspections are performed at accumulation/shipping areas, utilizing an inspection form similar to that shown in Attachment 9.6.
- (f) The hazardous waste log (or equivalent) shown in Attachment 9.7 of this procedure is maintained for hazardous and mixed hazardous/radioactive accumulation/shipping areas.
- (g) The elements of a Preparedness/Contingency Plan as outlined in Section 5.16 of this procedure are available on-site and implemented when necessary, as applicable to each site.
- (h) Waste shipments follow the requirements in Section 5.18 of this procedure.
- (i) Reports listed in Section 5.19 of this procedure are prepared and submitted as needed.
- (j) Records associated with the waste management program are maintained in accordance with Section 5.20 of this procedure.

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## 5.10 MIXED WASTE MANAGEMENT CONDITIONAL EXEMPTIONS


- [1] In order to maintain the mixed waste storage and treatment conditional exemptions, Environmental and/or Radiation Protection personnel are to verify that:

- (a) Notifications have been filed with the state agency and EPA as appropriate, for the mixed waste storage and treatment conditional exemption.
- (b) Wastes are stored in tanks or containers in accordance with the NRC license and the tanks or containers meet the chemical compatibility requirements.
- (c) Annual inventories are performed on the mixed wastes for which the exemption is claimed.

### NOTE

At IP2 for ALARA reasons, inspections of the PCB mixed wastes located at 108' of Unit 1 are performed via camera and the wastes in the reactor cavity pit are performed annually via camera per letter of response to NYSDEC notice of violation.

- (d) Quarterly inspections of the wastes are performed on the mixed wastes for which the exemption is claimed.
  - (e) Required records (exemption filing, inspections, inventories, contingency plans, etc) are maintained for 3 years after the exemption is no longer claimed.
- [2] In order to maintain the mixed waste transportation and disposal conditional exemptions, Environmental and/or Radiation Protection personnel are to verify that:
- (a) The waste meets the LDR standards, is manifested in accordance with federal or state-specific requirements, and is disposed of in a container (container with equivalent containment performance or HIC) at a designated LLRW disposal facility.
  - (b) Notifications have been filed with the state agency and EPA as appropriate, for the mixed waste transportation and disposal conditional exemption.

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- (c) The LLRW disposal facility is notified via certified delivery that the site is claiming the exemption prior to the first shipment of a waste stream.
  - The notification must include all the information required in federal or state-specific regulations.
- (d) The recordkeeping requirements to demonstrate that the waste has met the LDR standards have been met in accordance with federal or state-specific regulations.
- (e) Copies of all notifications, including return receipts, along with shipping records, are maintained for 3 years after the waste is shipped for disposal.


## 5.11 UNIVERSAL WASTE MANAGEMENT

### NOTE

All departments placing waste in a container must ensure that the container is properly labeled so that the waste can be appropriately characterized and managed.

Pesticides that are a hazardous waste when disposed must be managed in accordance with Section 5.9 of this procedure.

- [1] Employees, contractors and their supervision, with assistance from the Environmental Site Representative as needed, are to manage universal wastes (such as batteries, mercury containing equipment, fluorescent lamps, pesticides and other state-specific designated materials) as follows:
- (a) Placed in designated collection areas that are not exposed to precipitation or associated run-off.
  - (b) Managed in a way that prevents releases of any waste or component of the waste to the environment.
  - (c) Not accumulated on-site for more than one year.
  - (d) Marked with the date on which the universal waste was first declared a waste or was received at the accumulation/shipping area. This may be accomplished by marking each individual waste or each individual waste container, or by maintaining inventories or equivalent logs which document the accumulation start date.

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- (e) Batteries, mercury containing equipment, fluorescent lamps and pesticides, or containers holding universal wastes, are labeled as follows:

- Battery Label: "Universal Waste Battery(ies)", "Waste Battery(ies)" or "Used Battery(ies)".

**NOTE**

A universal waste mercury containing thermostat or container containing only universal waste mercury-containing thermostats may also be labeled "Universal Waste Mercury Thermostat(s)," "Waste Mercury Thermostat(s)" or "Used Mercury Thermostat(s)".


- Mercury-Containing Equipment Label: "Universal Waste Mercury Containing Equipment," "Waste Mercury Containing Equipment" or "Used Mercury Containing Equipment" for mercury containing equipment.
- Lamp Label: "Universal Waste Lamp(s)", "Waste Lamp(s)", or "Used Lamp(s)".
- Pesticide Label: "Universal Waste - Pesticide(s)", "Waste Pesticide(s)" along with product label.

**NOTE**

Mercury containing equipment or mercury containing thermostats must be packed in the container with packing materials adequate to prevent breakage during storage, handling and transportation.

Containers holding mercury containing equipment or mercury containing thermostats must also be designed to prevent the escape of mercury into the environment by volatilization.

- (f) Universal waste containers containing mercury containing equipment, mercury containing thermostats, lamps or pesticides are maintained in good condition and kept closed except when adding or removing wastes or inspecting contents.
- (g) Batteries that show evidence of leakage, spillage or damage that could cause leakage are maintained in a container that is closed, structurally sound and compatible with the contents of the battery.

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- (h) Lamps or mercury containing equipment that are broken are managed in accordance with Sections 5.9 or 5.15 of this procedure, depending on waste classification.
  - (i) Spills or leaks are responded to and managed in accordance with the sites SPCC Plan or applicable spill response procedure.
  - (j) Shipping papers accompany universal waste shipments off-site.
- [2] As a best management practice, Environmental Site Representative is to conduct periodic inspections of areas where universal wastes are collected or staged for shipment to verify that the requirements in Section 5.11[1] above are being met. These inspections may be documented as a footnote to Attachments 9.4 or 9.6 as appropriate.
- [3] For management practices associated with additional state designated universal wastes, refer to Sections 5.12 (Arkansas), 5.13 (Louisiana) or 5.14 (Vermont), as appropriate.

5.12 UNIVERSAL WASTE MANAGEMENT PRACTICES – ARKANSAS SPECIFIC

**CAUTION**

Expectations are that electronic materials be sent to an offsite vendor for refurbishment in lieu of managing as a universal waste.

- [1] At ANO, employees, contractors and their supervision, with assistance from the Environmental Site Representative as needed, are to manage consumer electronic items as follows:
- (a) Not accumulated on-site for more than one year.
  - (b) Stored in a manner that prevents the electronics from being exposed to the environment.
  - (c) Consumer electronic items or containers are labeled as follows:
    - "Universal Waste" followed by "Consumer Electronic Items", "Electronic Wastes" or "Used Electronic Items".

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- (d) Waste consumer electronic item must be contained in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the items. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions.
  - (e) Broken CRTs are managed in accordance with Sections 5.9 or 5.15 of this procedure, depending on waste classification.
- [2] As a best management practice, Environmental Site Representative is to conduct periodic inspections of areas where electronic materials are being managed as universal wastes to verify that the requirements in Section 5.12[1] above are being met. These inspections may be documented as a footnote to Attachments 9.4 or 9.6 as appropriate.

#### 5.13 UNIVERSAL WASTE MANAGEMENT PRACTICES – LOUISIANA SPECIFIC

##### **CAUTION**

Expectations are that electronic materials be sent to an offsite vendor for refurbishment in lieu of managing as a universal waste.


- [1] At RBS and W3, employees, contractors and their supervision, with assistance from the Environmental Site Representative as needed, are to manage electronics as follows:

- (a) Not accumulated on-site for more than one year.

##### **NOTE**

Provided no treatment is occurring (i.e., shredding, crushing, heating), electronics may be disassembled for the sole purpose of marketing, reselling, reusing or recycling components thereof.

- (b) Stored inside a building with a roof and four walls or in the cargo-carrying portion of a truck, such as in a trailer, in a manner that prevents the electronics from being exposed to the environment and ensures that the electronics are handled, stored, and transported in a manner that maintains the reuse or recyclability of any such device or component thereof.

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(c) Electronics are labeled as follows:

- "Universal Waste Electronics," "Waste Electronics," or "Used Electronics".

(d) Broken CRTs are managed in accordance with Sections 5.9 or 5.15 of this procedure, depending on waste classification.

[2] As a best management practice, Environmental Site Representative is to conduct periodic inspections of areas where electronic materials are being managed as universal wastes to verify that the requirements in Section 5.13[1] above are being met. These inspections may be documented as a footnote to Attachments 9.4 or 9.6 as appropriate.

#### 5.14 UNIVERSAL WASTE MANAGEMENT PRACTICES – VERMONT SPECIFIC


##### **CAUTION**

Although fluorescent lighting ballasts containing PCBs may be managed as universal waste at VYNPS, the requirements of 40CFR761 must also be met. Therefore, NMM Procedure EN-EV-120 (Polychlorinated Biphenyl Management Program) must also be followed when managing fluorescent lighting ballasts containing PCBs.

Expectations are that cathode ray tubes be sent to an offsite vendor for refurbishment in lieu of managing as a universal waste.

[1] At VYNPS, employees, contractors and their supervision, with assistance from the Environmental Site Representative as needed, may manage fluorescent lighting ballasts containing PCBs and cathode ray tubes as follows:

- Placed in designated collection areas that are not exposed to precipitation or associated run-off.
- Managed in a way that prevents releases of any waste or component of the waste to the environment.
- Not accumulated on-site for more than one year.

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**NOTE**

Inventories or equivalent logs may be maintained in lieu of marking the date on each individual universal waste item or container.

- (d) Marked with the date on which the universal waste was first declared a waste or was received at the accumulation/shipping area.
  - (1) The container collecting the universal waste may be marked with the date on the day the universal waste was first placed in the container in lieu of marking each individual waste item.
- (e) Fluorescent lighting ballasts containing PCBs and cathode ray tubes or containers holding universal wastes are labeled as follows:
  - PCB Lighting Ballast Label: "Universal Waste-PCB Ballast(s)", "Waste PCB Ballast(s)" or "Used PCB Ballast(s)."
  - Cathode Ray Tube Label: "Universal Waste-Cathode Ray Tube(s)", "Waste Cathode Ray Tube(s)", "Used Cathode Ray Tube(s)", "Universal Waste-CRT(s)", "Waste CRT(s)" or "Used CRT(s)."
- (f) For PCB-containing fluorescent lighting ballasts:
  - Immediately contain and transfer any universal waste PCB-containing fluorescent light ballasts that show evidence of leakage or damage to a container that meets the requirements of Sections 7-311(f)(2) through (4) of the Vermont regulations.
  - Manage fluorescent lighting ballasts which contain PCBs in a small capacitor that is either not intact or that is leaking, or that contain PCBs in the potting material in accordance with 40CFR761 and EN-EV-120 (Polychlorinated Biphenyl Management Program).
- (g) For cathode ray tubes:
  - Package CRTs in a manner adequate to prevent breakage during transportation, and when necessary during storage and handling. Packaging must lack evidence of damage that could cause breakage under reasonably foreseeable conditions.
  - Store CRTs within a structure or transportation unit such that the CRTs are protected from precipitation.



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- Place any CRT that shows evidence of breakage, leakage, spillage, or damage that could cause the release of glass particles under reasonably foreseeable conditions in a container. Container shall be closed, structurally sound, and compatible with the cathode ray tube(s) and shall be capable of preventing leakage, spillage or releases of broken cathode ray tubes, glass particles or other hazardous constituents from such broken tubes to the environment.
- Manage broken CRTs in accordance with Sections 5.9 or 5.15 of this procedure, depending on waste classification.

[2] As a best management practice, Environmental Site Representative is to conduct periodic inspections of areas where PCB lighting ballasts and CRT's are being managed as universal wastes to verify that the requirements in Section 5.14[1] above are being met. These inspections may be documented as a footnote to Attachments 9.4 or 9.6 as appropriate.


## 5.15 NONHAZARDOUS WASTE MANAGEMENT

### NOTE

All departments placing waste in a container must ensure that the container is properly labeled so that the waste can be appropriately characterized and managed. An acceptable sample label for affixing on a container is shown in Attachment 9.9.

[1] Employees, contractors and their supervision, with assistance from the Environmental Site Representative as needed, are to manage nonhazardous wastes as follows:

- Collected at designated location(s).
- Containers/tanks maintained in good condition.
- Containers/tanks labeled as to contents.
- Containers kept closed except when adding or removing wastes.
- Containers brought to an accumulation/shipping area once filled.
- Containers weighed if desired or applicable.

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[2] **Used Oil for recycling** is to be managed as follows:

- Collected at designated location(s).
- Containers/tanks maintained in good condition.
- Containers/tanks labeled as "Used Oil".
- Containers/tanks kept closed except when adding or removing wastes.
- Containers brought to an accumulation/shipping area once filled.
- Spills or leaks cleaned up and responded to in accordance with the sites SPCC Plan, or applicable site spill response procedures.
- Solvents not mixed with used oil.
- Used oil containing freon from refrigeration equipment is segregated from other used oils.


[3] **Waste Oil for incineration** is to be managed as follows:

- Containers maintained in good condition.
- Containers labeled as "Waste Oil".
- Containers kept closed except when adding or removing wastes.
- Spills or leaks cleaned up and responded to in accordance with the sites SPCC Plan, or applicable site spill response procedures.
- Solvents not mixed with waste oil.
- Waste oil containing freon from refrigeration equipment is segregated from other used oils.

**NOTE**

Section 5.15[4] is applicable to RBS and W3 only.

[4] **Industrial Solid Wastes** as defined in Section 3.0[2](l) are not stored or allowed to be stored long enough to cause a nuisance or health hazard.

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[5] **Empty Containers** are managed as follows:

**NOTE**

At IP2 and IP3, empty containers are managed by MP&C.

- Transfer empty containers greater than 5-gallons to areas designated by Environmental Site Representative or Radiation Protection.

**NOTE**

At ANO, IP2 and IP3, empty aerosol containers are not collected. However, if aerosol cans are discarded in regular trash, then the can must be empty as defined in Section 3.0[2](f)(3) of this procedure prior to discarding.

- Transfer empty aerosol containers to areas designated by Environmental Site Representative or Radiation Protection.
- With the exception of aerosol containers, discard empty containers less than 5-gallons in regular trash provided the containers are indeed empty as defined in Section 3.0[2](f).


## 5.16 CONTINGENCY PLAN

**NOTE**

At IP2 and JAF, the Hazardous Waste Contingency Plans are conditions of the sites' respective Mixed Waste TSDF Permits.


[1] As applicable to each sites generator category, the Environmental Site Representative is to maintain a Contingency Plan or ensure that other site plans or procedures address the following measures:

- (a) Security provisions for hazardous or mixed hazardous/radioactive accumulation/shipping areas (addressed in Section 5.9[2](e) and Attachment 9.6 of this procedure).
- (b) Emergency response equipment such as communications, fire protection, spill supplies and decontamination supplies (typically maintained in site Hazardous Material Emergency Response Plan).
- (c) Inspection of emergency response equipment (addressed in Section 5.9[2](e) and Attachment 9.6 of this procedure).

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- (d) Inspection of accumulation/shipping areas (addressed in Section 5.9[2](e) and Attachment 9.6 of this procedure).
  - (e) Coordination agreements with local authorities for emergency services (typically maintained in site Emergency Plan and Hazardous Material Emergency Response Plan).
  - (f) Evacuation procedures (typically maintained in site Emergency Plan).
  - (g) Environmental response guidelines, such as those listed below (typically maintained in site Hazardous Material Emergency Response Plan):
    - Notification process
    - Identifying hazardous waste spills
    - Spill assessment
    - Control procedures
    - Required reports
  - (h) Designated emergency coordinators (list of emergency coordinators typically maintained in Control Room).
- [2] Small quantity generators are not required to maintain a contingency plan, but must post the following information at the hazardous waste accumulation/shipping area:
- (a) Location of nearest telephone unless already present at the area.
  - (b) Name and telephone number of emergency coordinator or instructions on how to contact emergency coordinator.
  - (c) Location of fire extinguishers and spill control material and, if present fire alarm.
  - (d) Telephone number of fire department, unless facility has a direct alarm.

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## 5.17 TRAINING

- [1] Department Supervisors are to verify that direct reports that are involved in hazardous or hazardous/radioactive waste (mixed waste) management activities:
- (a) Complete RCRA training within six months of hire or transferring into a new position.
  - (b) Receive RCRA training on an annual basis at a level that is relevant to the position.
  - (c) If applicable to position, receive DOT training on a three-year basis at a level that is relevant to the position.
  - (d) Only work under trained supervision until RCRA and DOT training have been completed.
  - (e) If applicable to the position, receive hazardous materials emergency response training.
  - (f) If applicable to the site, employees involved with hazardous waste operations must complete 40 hours of HAZWOPER training prior to being called upon to perform in real emergencies and 8 hour refresher annually thereafter.
  - (g) If applicable to the site, employees involved with mixed waste management associated with the facility TSDF permit, must complete 24 hours of HAZWOPER training, in accordance with 29 CFR 1910.120(p)(7), prior to managing the mixed wastes and 8 hour refresher annually thereafter.
- [2] Sites are to verify that the RCRA, DOT and OSHA training programs include the following elements as applicable:
- (a) RCRA training required by 40CFR265 or state specific regulations
    - Personnel Safety
    - Release prevention and response
    - Preparedness/Contingency Plan
    - Emergency procedures
    - Hazardous waste management practices


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- Hazardous waste handling and operations
- (b) DOT training required by Subpart H of 49CFR172
  - General awareness/familiarization
  - Function-specific
  - Safety
  - Security Awareness, as applicable
  - In-Depth Security Training, as applicable
- (c) OSHA HAZMAT training required by 29CFR1910.120
  - First responder awareness level
  - First responder awareness/operations level
  - Hazardous materials technician
  - On-scene incident commander
- (d) OSHA HAZWOPER training required by 29CFR1910.120
  - Elements of emergency response plan
  - Standard operating procedures established for the job
  - Use of personal protective equipment
  - Procedures for handling emergency incidents

## 5.18 SHIPPING

- [1] For activities involving hazardous or hazardous/radioactive waste (mixed waste), the Environmental Site Representative and/or Radiation Protection are to verify that:
- (a) Only personnel that have completed the required DOT HM-126F training are allowed to prepare waste shipments.

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- (b) Waste shipments comply with applicable DOT regulations.
- (c) Waste samples sent to an offsite laboratory, comply with applicable DOT regulations and are accompanied by a Chain of Custody form.
- (d) Manifests are completed and accompany each waste shipment.
- (e) Radwaste shipping papers are completed in accordance with EN-RW-102 (Radioactive Shipping Procedure), if applicable.
- (f) Each hazardous or mixed hazardous/radioactive waste container of 119 gallons or less is marked and labeled with the following:
  - (1) HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.

\_\_\_\_\_  
Generator's Name and Address


\_\_\_\_\_  
Manifest Document Number

- (2) Date satellite accumulation quantity limit (55-gallons for hazardous waste or 1 quart for extremely hazardous waste) is reached.

**NOTE**

Use of the proper DOT shipping name constitutes providing the information listed in Steps 5.18[1](f)(3) and 5.18[1](f)(4) below.

- (3) Composition (i.e., waste oil, acetone 40%, toluene 60%) and physical state (i.e., solid, liquid, gas) of the waste.
- (4) Hazardous properties (i.e., ignitable, corrosive, reactive, toxic) of the waste.
- (g) Inventory sheets accompany lab pack shipments, when applicable.
- (h) Lab packs meet requirements of 40CFR264.316 or state specific regulations.

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- (i) Overpack containers holding liquid hazardous wastes are packaged according to DOT requirements.

**NOTE**


At IP2 and JAF, the Land Disposal Restriction form must be completed and filed in the Mixed Waste Operator Log prior to moving any mixed wastes to the on-site permitted storage facilities.

- (j) The disposal facility has been notified of the land disposal restrictions associated with the waste (Land Ban Notification Form).
- (k) Attachment 9.8 (or equivalent) has been completed for hazardous and hazardous/radioactive waste shipments.

## 5.19 REQUIRED REPORTS

- [1] Environmental Site Representative is to ensure the following reports are prepared and submitted, when required:
  - (a) Annual Hazardous Waste Report - submitted annually to state regulatory agency by March 1st of each year, unless otherwise waived or not required by the agency. [S-14736]
  - (b) Biennial Hazardous Waste Report – as applicable to each site, submitted biennially to state regulatory agency by March 1st of each year unless otherwise waived by the agency.
  - (c) Manifest Exception Report - submitted to the state regulatory agency for hazardous waste manifests that are not received back from the TSDF within the required time specified by state or federal regulations.
  - (d) Notification of Regulated Waste Activity - notification made to the state regulatory agency when there is a change in generator classification, types of hazardous waste managed, or a change in facility owner or operator.
  - (e) Spill Reports – typically submitted when there is a release, fire, or explosion involving hazardous waste which could threaten human health or the environment.
  - (f) Annual Industrial Solid Waste Report – submitted by Louisiana facilities by August 1st of each year. [L-12160]



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- (g) Quarterly Hazardous Waste Tax Report – submitted by Louisiana and New York facilities within 20 days of the end of the previous quarter, unless otherwise waived by the agency. [S-14737]
- (h) Quarterly PCB Disposal Status Certification Letter - submitted by IP2 to NYSDEC each quarter [Condition of IP2 Mixed Waste Storage Notice of Violation].
- (i) Hazardous Waste Reduction Plan Annual/Biennial Reports – submitted by New York Facilities by July 1st of each year to EPA and NYSDEC, unless exempted by state regulatory limits. The biennial and annual reports are submitted in alternating years.

## 5.20 RETENTION OF DOCUMENTS

- [1] Environmental Site Representative is to maintain records associated with the waste management program in accordance with EN-AD-103, as applicable.
- [2] If applicable, Department Training Coordinators are to process records (or equivalent) associated with waste management training.

## 6.0 INTERFACES

None

## 7.0 RECORDS

- 7.1 Refer to Section 5.20[1] above.


## 8.0 OBLIGATION AND REGULATORY COMMITMENT CROSS-REFERENCES

### 8.1 OBLIGATIONS AND COMMITMENTS IMPLEMENTED OVERALL

None

### 8.2 SECTION SPECIFIC OBLIGATIONS AND COMMITMENTS

None


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### 8.3 SITE SPECIFIC COMMITMENTS

Step	Site	Document	Commitment Number or Reference
[1]	ANO	OCNA119311	P-13159
[2]	RBS	LAC33:VII.1301.C	L-12160
[3]	RBS	LAC33:V.1111.B	S-14736
[4]	RBS	Louisiana Revised Statutes Title 47, Subtitle II, Chapter 7-A	S-14737

### 9.0 ATTACHMENTS

- 9.1 Sampling Instructions (Typical)
- 9.2 Hazardous Waste Satellite Accumulation Area Approval Sheet (Typical)
- 9.3 Hazardous Waste Satellite Accumulation Area Requirements (Typical)
- 9.4 Hazardous Waste Satellite Accumulation Area Inspection Form (Typical)
- 9.5 Hazardous Waste Accumulation/Shipping Area Requirements (Typical)
- 9.6 Hazardous Waste Accumulation/Shipping Area Inspection Form (Typical)
- 9.7 Hazardous Waste Log (Typical)
- 9.8 Hazardous Waste Shipping Checklist (Typical)
- 9.9 Sample Container Label (Typical)

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**ATTACHMENT 9.1**
**SAMPLING INSTRUCTIONS (TYPICAL)**
**SHEET 1 OF 4**

Table 1 is a general guide to types of waste that can be sampled by each of the samplers described below. A more detailed description of samplers is provided in SW-846.

**A. COMPOSITE LIQUID WASTE SAMPLER (COLIWASA)**

**Scope and Application** - Used to sample free-flowing liquids and slurries in containers, shallow open-top tanks, pits, and similar containers. Useful for sampling wastes consisting of several immiscible liquid phases. Device consists of a glass, plastic, or metal tube equipped with an end closure that can be opened and closed while the tube is submerged in material to be sampled.

**General Comments and Precautions**

1. Do not use a plastic COLIWASA to sample wastes containing organic materials, unless it is constructed of fluorocarbons (e.g., Teflon). A plastic COLIWASA may be used to sample used oil since it is not likely to dissolve the plastic.
2. Do not use a glass COLIWASA to sample liquids that contain hydrofluoric acid.
3. If significant amounts of solid material are present within 2 inches of container bottom to be sampled, special procedures will be necessary to obtain representative sample of solid phase.

**Procedure**

1. Clean COLIWASA.
2. Adjust sampler's locking mechanism to verify that the stopper provides a tight closure and then open sampler.
3. Slowly lower sampler into waste at a rate (1 in/3 sec) that permits level of liquid inside and outside sampler to remain the same. If level of waste in sampler tube is lower inside than outside, sampling rate is too fast and will produce a non-representative sample.
4. When the sampler hits the bottom of the waste container close the sampler.
5. Withdraw COLIWASA from waste and wipe the outside with a disposable cloth or rag.

**B. WEIGHTED BOTTLE**


**Scope and Application** - Device used to sample liquids and free-flowing slurries. Consists of a glass or plastic bottle, sinker, stopper, and a line that is used to lower, raise, and open the bottle. Weighted bottle with line is built to the specifications in ASTM Methods D270 and E300.

**General Comments and Precautions**

1. Do not use non-fluorocarbon plastic bottle to sample organic waste materials.
2. Do not use a glass bottle to sample wastes that contain hydrofluoric acid.
3. Before sampling, verify waste will not corrode the sinker, bottle holder, or line.

**Procedure**

1. Clean bottle.
2. Assemble weighted bottle sampler.
3. Lower sampler to directed depth and pull out the bottle stopper by jerking the line.
4. Allow bottle to fill completely as evidenced by cessation of air bubbles.
5. Raise sampler, cap, and wipe with disposable cloth. Bottle can serve as sample container.

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ATTACHMENT 9.1

SAMPLING INSTRUCTIONS (TYPICAL)

SHEET 2 OF 4

#### C. DIPPER

**Scope and Application** - Device used to sample liquids and free-flowing slurries. Consists of a glass or plastic beaker clamped to end of a 2- or 3- piece telescoping aluminum or fiberglass pole that serves as handle. Dippers are not commercially available, therefore can be fabricated.

##### General Comments and Precautions

1. Do not use a non-fluorocarbon plastic beaker to sample organic waste materials.
2. Do not use a glass beaker to sample wastes of high pH or wastes that contain hydrofluoric acid.
3. Paint aluminum pole and clamp with a 2-part epoxy or other chemical-resistant paint when sampling either alkaline or acidic wastes.

##### Procedure

1. Clean beaker, clamp and handle.
2. Assemble dipper by bolting adjustable clamp to the pole. Place beaker in clamp and fasten shut.
3. Turn dipper so mouth of beaker faces down and insert into waste material. Turn beaker right side up when dipper is at desired depth. Allow beaker to fill completely as shown by the cessation of air bubbles.
4. Raise dipper and transfer sample to container.

#### D. THIEF

**Scope and Application** – Device used to sample dry granules or powdered wastes whose particle diameter is less than one-third the width of the slots. Consists of two slotted concentric tubes usually made of stainless steel or brass. Outer tube has a conical pointed tip that permits sampler to penetrate material being sampled. Inner tube is rotated to open and close sampler. A thief is available at lab supply stores.

##### Procedure


1. Clean sampler.
2. Insert closed thief into waste material. Rotate inner tube to open thief. Wiggle the unit to encourage material to flow into thief. Close thief and withdraw. Place sampler thief in a horizontal position with the slots facing upward. Remove inner tube from thief and transfer sample to a container.

#### E. TRIER

**Scope and Application** – Device used to sample moist or sticky solids with a particle diameter less than one-half the diameter of the trier. Consists of a tube cut in half lengthwise with a sharpened tip that allows sampler to cut into sticky solids and loosen soil. Triers 61-100 cm long and 1.27 - 2.54 cm in diameter are available at lab supply stores. A large trier can be fabricated.

##### Procedure

1. Clean trier.
2. Insert trier into waste material 0 to 45° from horizontal. Rotate trier to cut a core of the waste. Remove trier with concave side up and transfer sample to container.

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ATTACHMENT 9.1

SAMPLING INSTRUCTIONS (TYPICAL)

SHEET 3 OF 4

#### F. AUGER

**Scope and Application** – Device used to sample hard or packed solid wastes or soil. Consists of sharpened spiral blades attached to a hard metal central shaft. Augers are available at hardware and lab supply stores.

##### Procedure

1. Clean sampler.
2. Bore a hole through middle of an aluminum pie pan large enough to allow blade of auger to pass through. Pan will be used to catch sample brought to surface by auger.
3. Place pan against sampling point. Auger through hole in pan until desired sampling depth is reached. Back off auger and transfer sample in pan and adhering to auger to a container. Spoon out rest of loosened sample with a sample trier.


#### G. SCOOP AND SHOVEL

**Scope and Application** – Devices used to sample granular or powdered materials in bins, shallow containers and conveyor belts. Scoops are available at lab supply stores. Flat-nosed shovels are available at hardware stores.

##### Procedure

1. Clean sampler.
2. Obtain a full cross section of waste material using a scoop or shovel that is large enough to contain the waste collected in one cross section sweep.



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**ATTACHMENT 9.2 HAZARDOUS WASTE SATELLITE ACCUMULATION AREA APPROVAL SHEET (TYPICAL)**  
**SHEET 1 OF 2**

♦ **PART A (Completed by Requesting Department)**

**SATELLITE ACCUMULATION AREA LOCATION:** \_\_\_\_\_  
 \_\_\_\_\_

**TYPE OF WASTE ACCUMULATED:** \_\_\_\_\_

**RESPONSIBLE DEPARTMENT:** \_\_\_\_\_

**OTHER INDIVIDUALS RESPONSIBLE FOR AREA:** ☐ YES ☐ NO (IF YES, COMPLETE PAGE 2 OF 2 AND ATTACH)

**ACKNOWLEDGEMENT OF RESPONSIBILITIES: (ATTACH ATTACHMENT 9.3 OF THIS PROCEDURE)**

I have read the requirements outlined in Attachment 9.3 of NMM Procedure EN-EV-106, Waste Management Program, and clearly understand my responsibilities associated with this satellite accumulation area. In addition, I understand that it is my responsibility to verify that other personnel listed on the attached also clearly understand the requirements associated with this area.

\_\_\_\_\_/\_\_\_\_\_/\_\_\_\_\_  
 Printed Name Signature Date

**NOTE: Environmental Site Representative approval must be obtained prior to establishing this area.**

♦ **PART B (Completed by Environmental Site Representative)**


**APPROVAL:** \_\_\_\_\_/\_\_\_\_\_  
 Signature Date



**SHEET 2 OF 2**

[illegible]




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**ATTACHMENT 9.3      HAZARDOUS WASTE SATELLITE ACCUMULATION AREA REQUIREMENTS (TYPICAL)**  
**SHEET 1 OF 2**

Responsibility	Requirement
Department Generators	<ul style="list-style-type: none"> <li>a. Satellite Area Accumulation Inventory Log (or equivalent) completed whenever wastes are added to container.</li> <li>b. Waste area collection approved by Environmental Site Representative and/or Radiation Protection. *</li> <li>c. Waste container under the control of the department generating the waste.</li> <li>d. No more than 55-gallons of waste accumulated in the area or no more than one-quart of acute waste accumulated in the area.</li> <li>e. Containers marked "Hazardous Waste" or with other words identifying contents. For IPEC and JAF, containers marked "Hazardous Waste" and with other words identifying contents of the containers.</li> <li>f. If applicable, container marked "Radioactive Waste".</li> <li>g. Container labels visible and legible.</li> <li>h. Containers in good condition with no evidence of leakage, spillage, rust, damage or bulges.</li> <li>i. Containers kept closed, except when adding or removing waste, or inspecting contents.</li> <li>j. Wastes compatible with container.</li> <li>k. Area clutter-free to allow for container inspection.</li> <li>l. Good housekeeping management practices implemented.</li> <li>m. Secondary containment provided for containers containing liquid.</li> <li>n. Containers containing ignitable wastes properly grounded.</li> <li>o. Containers dated and moved to an accumulation/shipping area within three days of becoming full. *</li> <li>p. Environmental Site Representative notified prior to moving a waste container to the accumulation/shipping area. *</li> <li>q. Containers secured during transfer to the accumulation/shipping area.</li> <li>r. Control Room notified immediately should a spill occur.</li> </ul>
* Not applicable if satellite accumulation area maintained by Environmental Site Representative.	



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**ATTACHMENT 9.4 HAZARDOUS WASTE SATELLITE ACCUMULATION AREA INSPECTION FORM (TYPICAL)**  
**SHEET 1 OF 1**

Requirement	SAT 1	SAT 2	SAT 3	SAT 4	SAT 5	SAT 6	SAT 7
Waste accumulated in area <55 gallons? Acute waste <1 quart?	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N
Approximate weight in satellite area (pounds).							
Container dated with date first placed in area?	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N
Containers labeled Hazardous Waste, Radioactive or Contents Identified? Labels visible?	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N
Incompatible waste segregated?	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N
Container compatible with contents?	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N
Containers in good condition, no leaks, corrosion, or damage that increase risk of leak or rupture?	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N
Containers closed except when sampling, adding or inspecting?	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N
Areas under "Process Owners" control?	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N
Does area create employee hazard or violate safety requirements? (If Yes, contact Supervision and Plant Safety).	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N
Secondary containment provided for liquid waste?	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N


Number	Satellite Area (SAT) Location	Estimate of Generation		
		Waste Stream	Container Volume	Container Pounds
1				
2		Paint Solids	55 Gallons	~ 500 – 600
3		Paint Liquids	55 Gallons	~ 400 – 500
4		Oil/Solvents	55 Gallons	~ 500 – 600
5		Diesel Fuel Oil/Solvents	30 Gallons	~ 260
6				
7				

Inspected By: \_\_\_\_\_

Date: \_\_\_\_\_


Correction Actions: \_\_\_\_\_

\_\_\_\_\_

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**ATTACHMENT 9.5 HAZARDOUS WASTE ACCUMULATION/SHIPPING AREA REQUIREMENTS (TYPICAL)**  
**SHEET 1 OF 1**

Responsibility	Requirement
Environmental Site Representative & Radiation Protection	<ul style="list-style-type: none"> <li>a. Accumulation area has restricted access.</li> <li>b. Area clutter free.</li> <li>c. Accumulation area has impervious floors.</li> <li>d. Secondary containment provided for containers, as applicable.</li> <li>e. Communication, spill control, fire control, and emergency equipment available and operable.</li> <li>f. Containers marked "Hazardous Waste."</li> <li>g. If applicable, containers marked "Radioactive Waste".</li> <li>h. Containers marked with type of material, if desired or applicable.</li> <li>i. Containers marked with date accumulation started.</li> <li>j. Container labels visible and legible.</li> <li>k. Containers weighed, if desired or applicable.</li> <li>l. Containers in good condition with no evidence of leakage, spillage, rust, damage or bulges.</li> <li>m. Containers kept closed, except when inspecting contents.</li> <li>n. Wastes compatible with containers.</li> <li>o. Incompatible wastes segregated.</li> <li>p. Sufficient aisle space exists for container inspection.</li> <li>q. Containers holding ignitable or reactive waste located at least 50 feet from property line.</li> <li>r. Records (or equivalent) of accumulation time maintained on waste containers.</li> <li>s. Control Room notified immediately should a spill occur.</li> </ul>

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**ATTACHMENT 9.6 HAZARDOUS WASTE ACCUMULATION/SHIPPING AREA INSPECTION FORM (TYPICAL)**  
**SHEET 1 OF 1**

Requirement	Accumulation/Shipping Area	Mixed Waste Accumulation/Shipping Area
Containers labeled Hazardous Waste and if applicable Radioactive? Labels visible?	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N
Hazardous waste containers dated with accumulation date?	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N
Universal wastes and containers labeled and dated?	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N
Used oil containers labeled "Used Oil"?	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N
Nonhazardous waste containers labeled and in good condition?	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N
Incompatible waste segregated?	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N
Container compatible with contents?	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N
Containers in good condition, no leaks, corrosion, or damage that increase risk of leak or rupture?	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N
Containers closed except when sampling, adding or inspecting?	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N
Does area create employee hazard or violate safety requirements? (If Yes, contact Supervision and Plant Safety).	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N
Secondary containment provided for liquid waste?	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N
Communications, spill control, fire protection and eyewash equipment available/operable?	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N
Area clutter free with adequate aisle space?	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N
Area secured?	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N
Number of hazardous waste containers in area?		

Inspected By: \_\_\_\_\_ Date: \_\_\_\_\_


Correction Actions: \_\_\_\_\_

\_\_\_\_\_  
 \_\_\_\_\_

## HAZARDOUS WASTE LOG (TYPICAL)


**SHEET 1 OF 1**

[illegible]

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**ATTACHMENT 9.8**
**HAZARDOUS WASTE SHIPPING CHECKLIST (TYPICAL)**
**SHEET 1 OF 3**
**PRE-SHIPMENT CHECKLIST**

Shipment Date: _____		
Waste data sheet on file for each waste to be shipped. (If no, take necessary action to get waste approved)		
<input type="checkbox"/> Yes <input type="checkbox"/> No		
TSDF Name: _____		
EPA ID Number: _____		
Generator portion of manifest completed: <input type="checkbox"/> Verified		
Generator EPA ID number & address on manifest correct: <input type="checkbox"/> Verified		
TSDF EPA ID number & address on manifest correct: <input type="checkbox"/> Verified		
Generator portion of manifest contains unique 5-digit manifest document number, if applicable: <input type="checkbox"/> Verified		
DOT shipping name(s) accurately reflect wastes materials on manifest: <input type="checkbox"/> Verified		
24-hour emergency contact listed on manifest: <input type="checkbox"/> Verified		
Containers properly labeled with a hazardous waste label: <input type="checkbox"/> Verified		
Containers properly sealed and not leaking: <input type="checkbox"/> Verified		
55-gallon containers torqued to 60 pounds: <input type="checkbox"/> Verified		
Land ban forms completed and included with manifest: <input type="checkbox"/> Verified		
Land ban forms accurately reference manifest number: <input type="checkbox"/> Verified		
Land ban forms accurately reference generator EPA ID number: <input type="checkbox"/> Verified		
Copy of land ban forms made for file: <input type="checkbox"/> Verified		
ERG(s) prepared for each waste stream: <input type="checkbox"/> Verified <input type="checkbox"/> Not Applicable		

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**ATTACHMENT 9.8**


**HAZARDOUS WASTE SHIPPING CHECKLIST (TYPICAL)**

**SHEET 2 OF 3**

**SHIPMENT CHECKLIST**

<b>Shipment Date:</b> _____	
<b>Manifest number(s) for this shipment:</b> _____	
<b>Vehicle License Plate Number:</b> (trailer portion)	<b>State:</b> _____
<b>DOT Hazardous Materials Certificate of Registration Number:</b> _____	
<b>State Waste Transporter Permit (if applicable):</b>	
<b>Permit Number:</b> _____	
<b>Permit Expiration Date:</b> _____	
<b>Vehicle License Number Listed on State Permit:</b> <input type="checkbox"/> Verified	
<b>Disposal State Transporter Permit (if applicable):</b> (located on trailer portion)	
<b>Hauler Permit Number:</b> _____	
<b>Decal Number:</b> _____	
<b>Expiration Date:</b> _____	
<b>Placards Needed:</b> <input type="checkbox"/> Verified	
<b>Manifest requires waste to be returned to facility if undeliverable:</b> <input type="checkbox"/> Verified	
<b>Transporter and generator signed manifest:</b> <input type="checkbox"/> Verified	
<b>Copy of signed manifest retained on file:</b> <input type="checkbox"/> Verified	



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**ATTACHMENT 9.8**  
**SHEET 3 OF 3**


**HAZARDOUS WASTE SHIPPING CHECKLIST (TYPICAL)**

**HAZARDOUS WASTE SHIPMENTS**

**POST SHIPMENT CHECKLIST**

Manifest number(s) for this shipment: _____	
Shipment Date: _____	
Shipment date plus 35 days: _____	
Shipment date plus 45/60 days: _____	
Copy received from TSDF within 35 days: (If no, contact TSDF and find out status)	<input type="checkbox"/> Yes <input type="checkbox"/> No
Copy received from TSDF within 45 days if large quantity generator: (If no, file Exception Report with state agency)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Copy received from TSDF within 60 days if small quantity generator: (If no, file Exception Report with state agency)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
If an Exception Report was filed, note letter number and date:	

\* For Louisiana facilities, Exception Report is only required to be filed if facility is a large quantity generator.

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ATTACHMENT 9.9  
SHEET 1 OF 1

SAMPLE CONTAINER LABEL (TYPICAL)

<b>ENTERGY NUCLEAR DRUM CONTROL PROGRAM</b>	
Supervisor_____	Ext_____
Worker_____	Ext_____
Department_____	
Work Request_____	
Contents_____	
Source_____	
Date_____	Location_____

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**CONTROLLED DOCUMENT REVIEW/APPROVAL FORM**

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<b>DOCUMENT INFORMATION</b>
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<b>REVIEWS / APPROVALS</b>
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Action Taken	Action Date	Last Name	First Name	Facility	Approval
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Note: all fields are taken from the TIMX600 panel for documents with an associated routing/approval (TIMX600) panel.