WP1

WASTE GENERATION PROCEDURE

1.0 PURPOSE

To provide a process to meet the requirements of DOE Order 435.1 for the identification and management of wastes generated through analytical processes in preparation for disposal by the Environmental Safety and Health (ESH).

2.0 RESPONSIBILITIES

2.1 Laboratory Manager or designee

- Evaluate analytical procedures and identify wastes streams for disposal according to guidance provided by the ESH.
- Establish waste generation records for each waste stream.
- Ensure laboratory staff receive training in this waste generation procedure.
- Monitor waste generation activities to ensure that the waste generation procedure is followed.
- Review and approve waste generation paperwork prior to transfer to ESH.

2.2 Laboratory Personnel

- Follow waste disposal steps identified in each analytical procedure.
- Follow waste generation procedure.
- Maintain records of radioactive materials added to the waste streams.
- Send the proper records concerning a waste stream to ESH.

2.3 ESH

- Provide interpretation of applicable regulatory documents to provide guidance for the identification of waste streams.
- Assume responsibility for the disposal of the waste stream(s) upon receipt of the proper records from ESSAP.

3.0 WASTE STREAMS

The following waste streams have been identified for ESSAP analytical processes:

- Dry Active Waste Profile Number L-010 per Master Profiles List of DOE 435.1.
- Soils Profile Number L-040 per Master Profiles List of DOE 435.1.
- Organic Liquids Profile Number L-070 per Master Profiles List of DOE 435.1.
- Mixed Waste Liquids to TSCA - Profile Number MW-001 per Master Profiles List of DOE 435.1.

4.0 TRAINING

CERTIFICATION RECORD FOR

PROCEDURE WP1

WASTE GENERATION

| | CHECKPOINTS |
|---|--------------------|
| JOB HAZARD ANALYSIS | |
| REVIEW OF WCP PLAN | |
| GENERAL AWARENESS TRAINING https://oraprod.gsystems.net/pwt | |
| SUBMISSION OF PROOF OF TRAINING | |
| WASTE PROFILES | |
| FORMS TRAINING | |

5.0 WASTE GENERATION

- 5.1 Waste is placed in the designated container for the appropriate waste stream at or before the end of the analytical process.
- 5.2 If the isotope(s) and concentration(s) of the generated waste is known, it will be recorded into a waste generation logbook (bound or electronic) for each waste stream.

- 5.3 If the isotope(s) and concentration(s) is not known, an aliquot from a full waste container will be analyzed using standard ESSAP laboratory procedures, which apply to the suspected contaminants, to determine the activity in the waste stream. In the case of organic liquids, the presence or absence of radioactivity will determine the final waste stream that is to be used for disposal. If no radioactivity is detected, the organic waste stream will be used. If radioactivity is detected, the mixed waste stream will be used.
- 5.4 When a container for a given waste stream becomes full, laboratory personnel will complete the appropriate paperwork (See attachments A and 2109.) and send the information to the Radiation Safety Officer of ESH. This will serve as notification that the waste container is ready for disposal.

6.0 RECORDS

- 6.1 ESSAP MUST maintain a record of all waste container information in an active file for one year.
- 6.2 After one year, this information will be archived in the RSAT archival room.

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| LOW-LEVEL | WASTE |
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ATTACHMENT A

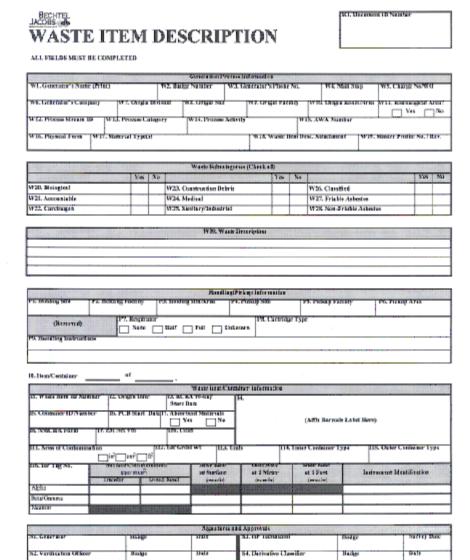
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| Al. Pyrephoric Haterisk | | Ad. Ignities Sources | | |
| A2. Active Chelsting Agents (> 1% of wasts) | | AT. Free Liquids | | |
| A3. TRU Badioisstopes (~ 100 nCl/g) | | AR. HCRA Waste | | |
| Ad. Explosive Materials | | A9. TSCA Waste | | |

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