

ISSUED

Effective Date: 09/05/18

WP 02-EC.11
Revision 13

Waste Isolation Pilot Plant Pollution Prevention Program Plan

Cognizant Department: Site Environmental
Compliance

Approved By: Stewart Jones



**Nuclear Waste
Partnership**

An AECOM-led partnership with BWXT and AREVA

**Waste Isolation Pilot Plant Pollution Prevention Program Plan
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CHANGE HISTORY SUMMARY

REVISION NUMBER	DATE ISSUED	DESCRIPTION OF CHANGES
13	09/05/18	<ul style="list-style-type: none">• Complete rewrite• Updated to standardized format• Updated document verbiage to properly convey current federal expectation and reporting requirements• Update document to properly accommodate new capital project and construction methodology• Editorial changes in accordance with MD 1.1, <i>Transition of Washington TRU Solutions Procedures and Documents to NWP.</i>

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1.0 INTRODUCTION

The U.S. Department of Energy (DOE) Carlsbad Field Office (CBFO) Nuclear Waste Partnership (NWP) Waste Isolation Pilot Plant (WIPP) Pollution Prevention (P2) Program Plan [WP 02-EC.11] is the mechanism which ensures compliance with the WIPP Environmental Policy Statement [DOE/WIPP 04-3310], implementing portions of the WIPP Environmental Management System (EMS) [DOE/WIPP 05-3318]. The P2 program plan communicates management expectation as an environmental health and safety obligation meeting municipal, county, state and federal government compliance requirements.

The P2 program plan communicates the preferred DOE strategy to implement policy that utilizes source reduction as a key P2 program expectation. The P2 program plan defines management's expectation regarding program participation, performance, activity boundaries, products and materials to be addressed and managed, the type of information (data) to be collected, including the criteria and frequency specific to fulfilling facility reporting requirements.

The P2 program plan and its expectations apply to employees, contactors, subcontractors, vendors, design project contractors, and those designated staff/workers supporting the WIPP mission without exception regardless of size, budget, priority, or function.

The P2 program plan is a resource to be referenced prior to initiating any applicable project regardless of phase, prior to contract award and/or product acquisition. The prescribed methodology serves to ensure the establishment of the facilities due diligence in accordance with the following internal and external drivers.

INTERNAL DRIVERS:

- DOE/WIPP 04-3310, *WIPP Environmental Policy Statement*
- DOE/WIPP 11-3474, *WIPP Electronic Management Policy Statement*
- WP 02-EC.07, *Waste Isolation Pilot Plant Sustainable Procurement Plan*
- WP 02-EC.08, *National Environmental Policy Act Compliance Plan*
- DOE/WIPP 05-3318, *WIPP Environmental Management System Description*
- WP 15-PC3042, *Credit Card Purchases*
- WP 15-PC3609, *Preparation of Purchase Requisitions*
- DOE/WIPP 93-004, *Waste Isolation Pilot Plant Land Management Plan*

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EXTERNAL DRIVERS:

- Title 42 United States Code (USC) – *Public Health and Welfare*
 - Chapter 15B - *Air Pollution Control* §§ 1857-1858
 - Chapter 55 - *National Environmental Policy* §§ 4321-4370m-12
 - Chapter 82 - *Solid Waste Disposal* §§ 6901-6992k
 - Chapter 85 - *Air Pollution Prevention and Control* §§ 7401-7671q
 - Chapter 91 - *National Energy Conservation Policy* §§ 8201-8287d
 - Chapter 116 - *Emergency Planning and Community Right to Know* §§ 11001-11050
 - Chapter 125 - *Renewable Energy and Energy Efficiency Technology Competitiveness* §§ 12001-12007
 - Chapter 133 - *Pollution Prevention* §§ 13101-13109 (P2 Act of 1990)
- Title 40 Code of Federal Regulation (CFR), *Protection of Environment*, Subchapters C through U
 - Subchapters C-U: Clean Air Act (CAA), National Emissions Standards for Hazardous Air Pollutants (NESHAP), Clean Water Act (CWA), Safe Water Drinking Act (SDWA), Pesticide Programs, Radiation Protection Programs, Noise Abatement Programs, and Solid Waste Programs based on the Resource Conservation and Recovery Act (RCRA) part 239-282
- Title 48 Code of Federal Regulations (CFR) Subchapter 952.223-78, *Sustainable Acquisition Program*
- Title 48 Code of Federal Regulations (CFR) Chapter 1, *Federal Acquisition Regulation (FAR)*, Subchapter D, Subpart 23.10, *Federal Compliance with Right-to-Know Laws and Pollution Prevention Requirements*, and Subpart 23.8, *Ozone-Depleting Substances and Greenhouse Gases*.
- DOE Order 436.1, *Departmental Sustainability*
- DOE Guidance 436.1-1, *Federal Sustainable Print Management*
- DOE Acquisition Regulations (DEAR), I.143/970.5223-6
- DOE required annual, site sustainability report (SSP)
- DOE required annual, EMS program status/ISO 14001 standard compliance update
- EO 13834, *Efficient Federal Operations*
- New Mexico Administration Code (NMAC), 20.4.1.500
- Hazardous Waste Facility Permit (HWFP), Section 2.4, *Waste Minimization Program*.

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- Managing Operating Contractor (MOC) Prime Contract
- Waste Isolation Pilot Plant Land Withdrawal Act, Public Law 102-579

2.0 ABBREVIATIONS AND ACRONYMS

AR/VR	Approval Request/Variation Request
ASER	Annual Site Environmental Report
BECR	Biennial Environmental Compliance Report
BOM	Bill of Material
CAA	Clean Air Act
CFR	Code of Federal Regulations
CPG	Comprehensive Procurement Guideline
CWA	Clean Water Act
DEAR	Department of Energy Acquisition Regulations
DOE	U.S. Department of Energy
EMS	Environmental Management System
EO	Executive Order
EPA	U.S. Environmental Protection Agency
EPEAT	Electronic Product Environmental Assessment Tool
FAR	Federal Acquisition Requirement
GET	General Employee Training
GHG	Greenhouse Gas
GSA	General Services Administration
HVAC	Heating, Ventilation, Air Conditioning
HWFP	Hazardous Waste Facility Permit
MLD	Material Level Determination
MOC	Managing Operator Contractor
NESHAP	National Emissions Standards for Hazardous Air Pollutants
NMAC	New Mexico Administrative Code
NMED	New Mexico Environmental Department
NSJ	Non-Sustainable Justification
NWP	Nuclear Waste Partnership LLC
ODS	Ozone Depleting Substance
P2	Pollution Prevention

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PPA	Property Protection Area
PPOA	Pollution Prevention Opportunity Assessment
PRCN	Purchase Change Request Notice
QA	Quality Assurance
RCRA	Resource Conservation and Recovery Act
RFD	Request for Disposal
RIDS	Records Inventory and Disposition Schedules
SDS	Safety Data Sheet
SDWA	Safe Water Drinking Act
SEC	Site Environmental Compliance
SFtool	Sustainable Facilities Tool
SNAP	Significant New Alternatives Policy
SOW	Statement of Work
SSP	Site Sustainability Plan
STR	Site Technical Representative
TARP	Technical Action Request Form
TEP	Triennial Performance report
VOC	Volatile Organic Compound
WIPP	Waste Isolation Pilot Plant

3.0 DEFINITIONS

- **Acquisition Planners:** Any NWP or subcontract person who plans and specifies purchase of a product, material or service including, but not limited to, engineers, requisitioners, subcontract technical representatives (STR), project managers, and p-card holders.
- **BioBased and BioPreferred Products:** A commercial or industrial product (other than food or feed) that is composed, in whole or in significant part, of biological products or renewable agricultural (plant, animal, and marine) or forestry materials.
- **Expectation:** The act or state of looking forward to anticipate the preferred behavior or expected outcome will be achieved and/or met.
- **Practicable:** Capable of being consistently used with performance in accordance with applicable specifications, availability at a reasonable price, availability within a reasonable period of time, and maintenance of a satisfactory level of competition.

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- **Recycled Content:** Product containing waste materials and byproducts which have been recovered or diverted from solid waste, but such terms do not include those materials and byproducts generated from and commonly reused within an original manufacturing process.
- **SmartWay:** An EPA program that helps the freight transportation sector improve supply chain efficiency. SmartWay reduces transportation-related emissions, environmental risks for companies and increases global energy security.
- **Specification:** A description of the technical requirements for a material, product, or service that includes the criteria for determining whether these requirements are met. In general, specifications are in the form of written commercial designations, industry standards, and other descriptive references.
- **Sustainable Products:** Sustainable (Eco-friendly) products are those products that provide environmental, social and economic benefits while protecting public health and environment over their whole life cycle, from the extraction of raw materials until the final disposal.

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4.0 CONTEXT

The P2 strategy at WIPP begins by ensuring any applicable products, goods and/or services meet the sustainability guidance published by the General Services Administration (GSA) as directed by the sustainable procurement plan [WP 02-EC.07, *Waste Isolation Pilot Plant Sustainable Procurement Plan*]. GSA guidance is managed by the GSA via the agencies Sustainable Facilities Tool (SFtool). The SFtool may be accessed electronically at <https://sftool.gov/greenprocurement>. Adherence to this action enables the facility to maintain and meet various clause expectations detailed by the managing operator contractors (MOC) prime contract.

The P2 program plan initiates the DOE preferred method of source reduction as prescribed by the Pollution Prevention Act of 1990, 42 United States Code §§13101-13109. P2 is a concept that includes resource conservation [water, energy], waste minimization, pollutant reduction [air, soil and water], and habitat conservation [reduction of greenhouse gas emissions, volatile organic compounds, and ozone depleting substances] by applying standards that proactively manage perceived and/or probable risk associated with pollution. The preferred method directs DOE site management, including their contractors/subcontractors to implement a policy that instructs facility personnel to acquire sustainable products designed to limit pollution potential associated with the products use, transportation and/or storage. The applied preferred method emphasizes the protection of the employee and their personal health while simultaneously seeking products that preserve the environment.

The use of sustainable products serves to foster a decrease in the observed social, economic, and environmental risks associated with any applicable product. Adherence to this plan ensures efforts to control, decrease, and manage the use of hazardous chemicals and substances are integrated into daily operation. This action ensures the facility and any applicable product acquisition is completed in a manner that promotes project sustainability, while supporting mission resiliency.

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5.0 APPLICATION

Application of the P2 program plan expectation shall be based and applied to any applicable activity (work), capital and/or construction project to be completed and managed using the following criteria:

- A. The applicable activity shall be completed and managed within the WIPP site property protection area (PPA); solely under the control and influence of NWP/WIPP personnel.

The following management expectations, plans and procedures shall be implemented and applied in full without exemption.

- DOE/WIPP 04-3310, *WIPP Environmental Policy Statement*
 - DOE/WIPP 11-3474, *WIPP Electronic Management Policy Statement*
 - WP 02-EC.07, *Waste Isolation Pilot Plant Sustainable Procurement Plan*
 - WP 02-EC 11, *WIPP Pollution Prevention Program*
 - WP 02-RC.02, *Special Waste Management Plan*
 - WP 02-EC1108, *Construction Landfill*
 - WP 02-RC3108, *Request for Disposal (RFD)*
 - DOE/WIPP 05-3318, *WIPP Environmental Management System Description*
 - WP 15-PC3042, *Credit Card Purchases*
 - WP 15 PC3609, *Preparation of Purchase Requisitions*
 - DOE/WIPP 93-004, *Waste Isolation Pilot Plant Land Management Plan*
 - WIPP Recycling Guide
- B. The applicable activity shall be completed and managed outside the WIPP PPA; on any WIPP right-of-way; or within the 16 sections granted by the LWA; solely under the control and influence of NWP/WIPP personnel.

The management expectations, plans and procedures applied in Section 5.0, *Application*, Step A, remain applied in full without exemption.

- C. The applicable activity shall be completed and managed within the WIPP PPA; on any WIPP right-of-way; or within the 16 sections granted by the LWA; not solely under the control and influence of NWP/WIPP personnel.

The management expectations and required submittals shall be managed and collected in accordance with Section 7.0, *Reporting Requirements*, of this plan without exemption.

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- D. The applicable activity shall be completed and managed within the WIPP PPA on any right-of-way, or within the 16 sections granted by the LWA, indirectly under the control and influence of NWP/WIPP personnel.

This type of activity shall be reviewed on a case-by-case basis. The activity may include those having authorized access/right-of-way to the 16 sections granted by the LWA, managed under the WIPP Land Management Plan. These activities may be indirectly supervised by WIPP personnel, WIPP personnel have limited direct control and/or influence regarding the activity. These types of activities may include but may not be limited to activities supporting an emergency service provider (mutual aid partner), rancher, recreational land user, New Mexico Environmental Department (NMED), Bureau of Land Management (BLM), or utility company (e.g., power, water, phone, cell tower, internet, gas).

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6.0 OBJECTIVES

Objectives of the P2 program plan is to inform and educate employees, contractors, subcontractors, including those under the influence and/or control of WIPP management expectation regarding facility policy and procedure related to P2.

Management expectation is that any applicable visitor, land user, contractor, subcontractor, or assigned individual doing work for, on behalf of, or in the best interest of WIPP applies standards supporting the P2 preferred method of source reduction; in accordance with the sustainable procurement plan [WP 02-EC.07, *Waste Isolation Pilot Plant Sustainable Procurement Plan*]. This method instructs any product requester and/or user to seek products with the following specification, label, designation and/or certification:

- Recycled content
- BioBased and BioPreferred content
- EnergyStar certified
- Federal Energy Management Program (FEMP) designated
- Electronic Product Environmental Assessment Tool (EPEAT) gold rated
- WaterSense certified
- SaferChoice (Less-Toxic) labeled
- Significant New Alternate Policy (SNAP) designated
- Green House Gas (GHG) emission reduction criteria
- Ozone Depleting Substance (ODS) purchase restrictions
- Volatile Organic Compound (VOC) purchase restrictions
- SmartWay logistics standard

NOTE: If any product, good and/or service fails to meet the expectations of this plan, the product, good, and/or service may be required to have a Non-Sustainable Justification in the acquisition file and/or work package prior to product acquisition/purchase before work commencement.

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7.0 REPORTING REQUIREMENTS

P2 program plan expectation shall be communicated to those under the control and/or influence of WIPP personnel by verifiable written policy as a compliance obligation, to the following standard:

Information shall be collected, monitored and reported as a compliance obligation meeting the P2 program expectation in accordance with the Pollution Prevention Act. The information (data) shall serve to document WIPP has successfully met and continues to maintain environmental health and safety policy in support of the facilities environmental policy. This expectation includes but may not be limited to the following products, goods and/or services.

- Trash (solid waste)
- Traditional recycling (aluminum, cardboard, paper, and plastic)
[segregated/mixed/comingled]
- Wood waste (construction debris, pallets)
- Mixed metal waste (scrap)
- Cement or concrete demolition
- Construction waste containing asbestos
- Asphalt and roadway construction waste
- Electronic equipment waste
- Large/small appliance waste
- Sewer sludge waste
- Port-a-John bathroom facility and septic waste
- Medical waste (bandages, diabetic supplies)
- Storm water pond sludge waste
- Evaporative pond salt waste
- Mixed material construction waste
- Vehicle maintenance waste (lubricants, oil, tires)
- Leak and spill response waste
- Petroleum saturated soils
- Site generated hazardous chemical waste
- Site generated New Mexico special waste
- Alkaline battery
- Lead acid batteries (spent, non-damaged or damaged)

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- Lithium/NiCad batteries (spent, non-damaged or damaged) [applicable rechargeable power pack and/or battery cells from tools, radios]

Proper waste management requires the products listed above to reference and document the following information:

- Product description [common name];
- Product manufacturer;
- WIPP designated SDS number (if applicable, when the WIPP SDS number is not available and/or present attach a globally harmonized system compliant SDS);
- Product weight at time of disposal;
- Product container description (bucket, bag, drum) at time of disposal;
- Original product sustainability requirement (if not applicable otherwise denote N/A);
- Original quantity ordered and/or brought onto the 16 sections;
- Document product use (what purpose and/or use did the product have);
- What group, individual, contractor and/or subcontractor originally ordered the product;
- What group, individual, contractor or subcontractor applied and/or used the product being disposed;
- What was the original product value at time of purchase that is being disposed;
- What is the estimated value of the remaining, left over and/or un-useable product being disposed;
- What is the contract number and/or purchase order (PO) number used to originally purchase the product being disposed;
- Destination of the applicable product being disposed (if known: include the name, address and phone number of the landfill, recycling facility and/or hazardous waste company used to manage the product being disposed);

NOTE: The WIPP construction and demolition [C&D] landfill is managed and controlled by Site Environmental Compliance (SEC). Any material considered for placement must obtain SEC written approval. Approval may be granted on a case-by-case basis, if approved, SEC shall supply written permission detailing the type of material and approximate weight of the material being placed into the C&D landfill.

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8.0 REPORTING RECIPIENT AND FREQUENCY REQUIREMENTS:**8.1 DOE**

- SSP – Annual Site Sustainability Performance report: Topics include EMS program performance, waste diversion/recycling rate performance, waste minimization performance, energy and water efficiency, sustainable procurement performance and the annual travel/commuter survey.
- ASER – Annual Site Environmental Report: Topics include EMS program performance, waste diversion/recycling performance, waste minimization performance, energy and water efficiency and sustainable procurement performance.
- FedNet/Sam.gov – Annual Environmental Management System (EMS) program performance report: Topics include EMS program performance, waste diversion/recycling rate performance, waste minimization performance and sustainable procurement performance.

8.2 EPA

- BECR – Biennial Environmental Compliance Report: Topics include EMS program performance, waste diversion/recycling performance, waste minimization performance, energy and water efficiency and sustainable procurement performance.

8.3 NMED

- WMR – Annual Waste Minimization Report: Topics include EMS program performance, waste diversion/recycling rate performance, waste minimization performance and sustainable procurement performance.
- TEP – Triennial Environmental Performance report: External independent regulation review includes topics associated with EMS program performance, waste diversion/recycling performance, waste minimization performance, energy and water efficiency and sustainable procurement performance.

NOTE: The TEP was requested as a supplemental RCRA report to be delivered the DOE/EPA. This report may or may not become a requirement. At the time of creating this document this decision was not final, thus reference to the document was added as a preemptive measure.

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9.0 RECORDS

Supporting material created and/or produced by adhering to the sustainable procurement program plan, in support of the P2 program plan shall be maintained in accordance with WP 15-PC3609, *Preparation of Purchase Requisitions*, and WP 15-PC3042, *Credit Card Purchases*.

Records and support materials may include the following, but are not limited to:

- Referenced research materials
- Pre-procurement planning
- Bill of material/bill of lading
- Engineering specifications
- Engineering change notices
- Engineering technical evaluations
- Form fit function definitions
- Like for like part request evaluation forms
- Purchase requisition request forms
- Statement of Work (SOW)
- Work packages
- Buyer and vendor bid correspondence
- Sole source justification
- Non-sustainable justification (NSJ)
- Purchase orders (PO)
- Packing slips
- Invoices
- Purchase Requisition Change Notice (PRCN)
- Project change notice
- Material level determination (MLD)
- Approval request/variation request forms (AR/VR)
- Technology Action Request Form (TARP)
- Certificate of conformance
- Quality Assurance (QA) inspection documentation
- Site technical representative and/or vendor correspondence
- SDS submission evidence
- SDS approval evidence
- Product approval verification

Any document produced by the product requestor, product requisitioner, procurement buyer, or warehouse member could be considered support material that gets added to the product procurement file.

Records shall be made available to the requesting agent on demand during a performance evaluation if deemed necessary by QA or SEC management.

Any material deemed an official record shall be handled in accordance with WP 15-RM3006, *Records Inventory and Disposition Schedule Review and Approval*.

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10.0 RESPONSIBILITIES

10.1 Managing Operator Contractor (MOC)

The MOC shall ensure communication of the P2 program plan directly to relevant employees (acquisition planners). This includes applicable contractors, subcontractors, vendors, contract developers, buyers, requisitioners, credit card holders, group managers, and the STR.

The MOC shall ensure communication of applicable environmental protection policies, including the P2 program plan, prior to allowing the commencement of work on any WIPP property having right-of-way authority and/or the 16 sections granted under the WIPP Land Withdrawal Act 1992, as amended.

The MOC shall create (to the best of its ability) a mechanism to evaluate, monitor and improve on the performance of the P2 program. Evaluation of the P2 program is dependent on the collection of relevant P2 data defined within this plan. This evaluation process ensures the P2 program aligns with the expectations defined by the DOE/WIPP 05-3318, *WIPP Environmental Management System*.

The MOC shall require the collection and submission of P2 reporting data. Data collected may be submitted in whole or may require each operational group individually to directly submit the collected data to SEC. The data shall be provided to SEC four weeks prior to the end of each fiscal year and no later than October 1.

The MOC shall ensure P2 program plan expectations have been effectively communicated to any applicable agent (design architect and/or construction firm). Verification of effective communication may be completed via the contracted architectural/construction firms designated environmental, health, and safety plan (EHSP). The EHSP shall be required to contain the firm's waste management plan (WMP). The WMP shall be required to detail why, when, what, how and where applicable waste products will be managed, stored, and disposed, including how the data will be managed and reported.

The MOC shall ensure that any applicable product request specific to excessing, repurposing, recycling and/or disposal remains the responsibility of the requesting agent until such time the applicable product is released from MOC control and/or influence.

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10.2 Project Managers and/or the Project Assigned STR

Are responsible for confirming that applicable contract's, purchase orders (PO), scopes of work (SOW) and work packages effectively reference and communicate P2 program plan expectations in accordance with Section 7.0, *Reporting Requirements*.

Are responsible for confirming elements of the P2 program plan have been received and are thoroughly understood by any applicable contracted design firm, construction firm, contractor, subcontractor, vendor and/or any appointed individual doing work under the influence and/or control of WIPP.

Are responsible for ensuring the required P2 information is properly referenced and documented by any applicable EHSP/WMP prior to submitting to SEC for review and approval.

Are responsible for confirming and documenting the following applicable information product, goods and/or service as applicable, in accordance with Section 7.0, *Reporting Requirements*, to ensure proper reference.

Any applicable EHSP/WMP shall be required to document/account for the following information/material:

- Reference to the NWP/WIPP/CBFO contract number or PO number;
- Physical Name, address and phone number of the applicable company/contractor/individual;
- List detailing the type of materials/products (hazardous and nonhazardous) that may be generated as a waste/recycling product;
- Will there be a satellite accumulation area (SSA) set up and maintained to manage hazardous waste; If applicable, where will the SSA be located;
- What collection method will be applied [example: segregated (metal, wood, trash); recycling (mixed/co-mingled/single stream)];
- What type of and size of container will be used [bag, bucket, drum, tote, roll-off (2 yard, 5 yard, 30 yard, 40 yard)];
- How will the applicable labeling requirements be managed;
- What is the name, address and phone number of the [hazardous/nonhazardous] waste provider that will manage any listed waste/recycling product;
- How will the weight of the waste/recycling product be captured and documented specific to each listed type of [hazardous/nonhazardous] waste/recycling product;

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- What will be the frequency of collection [daily, weekly, bi-weekly, monthly, or on a as required on call basis];
- Destination of the applicable material (include the name, address and phone number of the hazardous waste facility/landfill/recycling facility used);
- How will the required product disposal information [weights/destination] be communicated to SEC and how often;
- Where will the records be managed/kept; how and when will the records be reported and who will be the responsible agent in charge of ensuring records specific to hazardous/nonhazardous waste/recycling products are properly managed and communicated;

NOTE: If applicable: copies of any hazardous/nonhazardous waste vendor contract or service agreement must be included with the original EHSP/WMP when submitted to SEC for review and approval.

10.3 Procurement

- Ensure compliance with federal requirements by practicing sustainable acquisition.
- Institute and utilize accurate and effective reporting and tracking mechanisms for sustainable procurement as required to meet federal regulations.
- Provide data for annual reports to DOE Headquarters (HQ) regarding sustainable procurement.
- Assist in identifying opportunities for procurement and use of sustainable products to WIPP organizations and subcontractors, and provide direction to organizations with the necessary information to properly report transactions.
- Provide the necessary procurement training for buyers and requisitioners to increase the procurement of sustainable goods and services in accordance with federal regulations and guidelines.
- Ensure adequate flow-down of applicable environmental regulations, policies, plans, and targets to subcontractor personnel especially as they pertain to P2, energy and water efficiency, and sustainable procurement.

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10.4 Property

- Ensure electronic equipment covered by DOE/WIPP 11-3474, *WIPP Electronic Management Policy Statement*, is properly managed and recycled.
 - Any electronic equipment containing refrigerant shall be made void of the refrigerant by recycling and/or recapture prior to the electronic equipment being properly recycled and/or disposed.

10.5 Operations

Operations shall be tasked to implement new efficient technologies that support the P2 program plan as applicable. Managers conducting activities or operations and facility modifications that involve the generation of waste are responsible for the following:

- Ensure the generation of waste is minimized to the greatest extent possible by promoting reduce, reuse and recycle.
- Ensure a mechanism is in place to collect and provide the plan required data specific to the collection of site generated non-hazardous waste (solid waste/recycling) from the contracted service provider (e.g., Waste Management) is properly collected and provided to SEC.
- Identify opportunities for reducing or eliminating waste by participating in the Pollution Prevention Opportunity Assessment (PPOA) process.
- Identify opportunities for reducing greenhouse gas (GHG) emissions through source reduction (e.g., process improvement or redesign).
- Promote participation and action that supports reuse and recycling
- Collect and communicate employee created and/or management assessment generated PPOA to senior management in accordance with the following;
 - MC 1.19, *Environmental Management Steering Committee*
 - DOE/WIPP 04-3310, *Environmental Policy Statement*
 - DOE/WIPP 05-3318, *WIPP Environmental Management System*
- Ensure site facilities, systems, and equipment are designed, constructed, and operated to minimize the generation of waste and GHG emissions to the extent economically practicable.
- Identify opportunities to reduce, reuse, and recycle construction materials and demolition debris where feasible rather than landfill disposal.
- Ensure personnel are presented with P2 objectives and support annual WIPP environmental targets.

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10.6 Communications

- Communications provides information to WIPP stakeholders about WIPP's commitment to continuous environmental improvement denoting the implementation of WP 02-EC.07, *Waste Isolation Pilot Plant Sustainable Procurement Plan*, WP 02-EC 11, *WIPP Pollution Prevention Program*, as key components of DOE/WIPP 05-3318, *WIPP Environmental Management System Description* supporting DOE/WIPP 04-3310, *Environmental Policy Statement*.

10.7 Technical Training

- Technical Training shall conduct training that informs WIPP personnel pursuant to the material contained within this plan. This task is completed in a manner conducive to the best interest of technical training; information may be provided in its entirety or get split out and integrated into the applicable training modules.
 - Such as General Employee Training (GET), GET Refresher, procurement related training, hazardous waste worker/responder training, including related environmental management training.

10.8 Employee

- Comply with the P2 program directives including recycling, solid waste management, energy conservation, water conservation, GHG reduction, sustainable procurement and any department environmental target designed to support the EMS.
- Consult with SEC staff to determine the proper disposal/recycle method to use when material has been identified as waste.
- WIPP employees are expected to look for, identify and report on P2 program plan improvement opportunities. Participation in the Pollution Prevention Opportunity Assessment (PPOA) process allowing an employee to present P2 related improvements directly to the sustainability, pollution prevention and/or EMS coordinator. The process involves elevating the applicable PPOA directly to senior management. When a PPOA is presented and deemed applicable and/or favorable to facility operation, senior management may implement strategy to recognize and correct the identified issue as granted under MC 1.19, *Environmental Management System Steering Committee*.

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10.9 SEC

- SEC shall review and approve any applicable EHSP and WMP a minimum of 20 days prior to any applicable projects start date. This review process ensures P2 program plan expectations have been effectively communicated and documented in accordance with the plans expectations.
- SEC (Pollution Prevention/Sustainability/EMS program coordinator) shall review and report any applicable employee generated PPOA directly to senior management to promote continuous improvement of the P2 program.
- The P2 program plan coordinator shall collect and report on P2 program plan performance annually as an EMS topic directly to senior management in accordance with DOE/WIPP 05-3318, *WIPP Environmental Management System Description*.
- SEC shall advise and support procurement and property in creation of the plan specified mechanisms required to support the P2 program plan.
- SEC shall advise and support operations/infrastructure/maintenance in the creation of the plan specified mechanisms required to support the P2 program plan.

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11.0 REFERENCES

DOCUMENT NUMBER AND TITLE
Executive Order 13834, <i>Efficient Federal Operations</i>
Executive Order 13693, <i>Planning for Federal Sustainability in the Next Decade</i>
Title 40 Code of Federal Regulation (CFR), <i>Protection of Environment</i> , Subchapters C through U
<ul style="list-style-type: none"> • Clean Air Act (CAA) [Subchapter C] • National Emissions Standards for Hazardous Air Pollutants (NESHAP) [Subchapter C] • Clean Water Act (CWA) [Subchapter D] • Safe Water Drinking Act (SDWA) [Subchapter D] • Pesticide Programs [Subchapter E] • Radiation Protection Programs [Subchapter F] • Noise Abatement Programs [Subchapter G] • Solid Waste Programs based on the Resource Conservation and Recovery Act (RCRA) Part 239-282 [Subchapter I]
Title 42 United States Code (USC), <i>Public Health and Welfare</i> ; §6901 et seq. - Section 6002(i)
<ul style="list-style-type: none"> • Chapter 15B - <i>Air Pollution Control</i> §§ 1857-1858 • Chapter 55 - <i>National Environmental Policy</i> §§ 4321-4370m-12 • Chapter 82 - <i>Solid Waste Disposal</i> §§ 6901-6992k • Chapter 85 - <i>Air Pollution Prevention and Control</i> §§ 7401-7671q • Chapter 91 - <i>National Energy Conservation Policy</i> §§ 8201-8287d • Chapter 116 - <i>Emergency Planning and Community Right to Know</i> §§ 11001-11050 • Chapter 125 - <i>Renewable Energy and Energy Efficiency Technology Competitiveness</i> §§ 12001-12007 • Chapter 133 - <i>Pollution Prevention</i> §§ 13101-13109
Title 48 Code of Federal Regulation, <i>Sustainable Acquisition Program</i> ; §952.223-78
Title 48 Code of Federal Regulations (CFR) Chapter 1, <i>Federal Acquisition Requirement</i> (FAR), Clauses §23.10 and 23.8; I.55-I.59
<ul style="list-style-type: none"> • I.55 FAR 52.223-10, <i>Waste Reduction Program</i> • I.56 FAR 52.223-11, <i>Ozone-Depleting Substances</i> • I.57 FAR 52-223-12, <i>Refrigeration Equipment And Air Conditioners</i> • I.58 FAR 52.52.223-14, <i>Toxic Chemical Release Reporting</i> • I.59 FAR 52.223-17, <i>Affirmative Procurement of EPA-Designated Items</i>
Department of Energy Acquisition Regulations I.143 (DEAR) 970.5223-6
DOE O 436.1, <i>Departmental Sustainability</i>
DOE G 436.1-1, <i>Federal Sustainable Print Management</i>
Department of Energy required annual, site sustainability report (SSP)
Department of Energy required annual, EMS program status/ISO 14001 standard compliance update
New Mexico Administrative Code; 20.4.1.500

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DOCUMENT NUMBER AND TITLE
Managing Operating Contractor (MOC) Prime Contract (Nuclear Waste Partnership LLC)
Waste Isolation Pilot Plant Hazardous Waste Facility Permit (HWFP); Sec. 2.4
Waste Isolation Pilot Plant Land Withdrawal Act, Public Law 102-579
DOE/WIPP 04 3310, <i>WIPP Environmental Policy Statement</i>
DOE/WIPP 05 3318, <i>WIPP Environmental Management System Description</i>
DOE/WIPP 11-3474, <i>Waste Isolation Pilot Plant Electronics Management Policy Statement</i>
DOE/WIPP 93-004, <i>Waste Isolation Pilot Plant Land Management Plan</i>
MC 1.19, <i>Environmental Management System Steering Committee</i>
MD 1.1, <i>Transition of Washington TRU Solutions Procedures and Documents to NWP</i>
WP 02-EC.07, <i>Waste Isolation Pilot Plant Sustainable Procurement Plan</i>
WP 02-EC.08, <i>National Environmental Policy Act Compliance Plan</i>
WP 02-RC.02, <i>Special Waste Management Plan</i>
WP 02-EC1108, <i>Construction Landfill</i>
WP 02-RC3108, <i>Request for Disposal</i>
WP 15-PC3042, <i>Credit Card Purchases</i>
WP 15-PC3609, <i>Preparation of Purchase Requisitions</i>
WP 15-RM3006, <i>Records Inventory and Disposition Schedule Review and Approval</i>
EA15PC3609-4-0, <i>Non-Sustainable Justification</i>

Attachment 1 – WIPP Recycling Program Summary and Guidelines:**Site-Generated Recycling Program:**

The P2 program has implemented recycling programs at the WIPP site, Skeen Whitlock Building, Cascades, and WIPP Labs. Recycling system collection bins are placed in strategic locations to increase participation for the explicit purpose of managing recyclable products, meeting WIPP compliance obligation.

RULES for Recycling:

Your participation matters.

All recycling products collected and managed in the state of New Mexico are sorted by hand, by people whom deserve your consideration and kindness.

Practice WIPP core values while recycling – Integrity, Safety, Ownership, Teamwork, Respect and Continuous Improvement.

- Food waste is considered a recyclable product contaminate
 - All products must be clean and dry
- (Water is considered a product contaminate and can turn our efforts into trash)

Recycling System Description:

Recycling system collection bins collect traditional recycling products including:

- Aluminum (clean and dry)
- Alkaline batteries (spent/dead)
- Cardboard (flattened/broken down)
- Glass (clean and dry)
- Paper (dry)
- Plastic (clean and dry)
- Ink/toner cartridges (un-usable/spent/empty)

Attachment 1 – WIPP Recycling Program Summary and Guidelines:

Each recycling system collection bin manages traditional recycling products in the following manner:

- Alkaline batteries are collected in a separate properly labeled plastic bucket with the associated zip-lock plastic bags for placing an individual alkaline battery prior to placement into the collection bucket.
- Aluminum and Plastic recycling products are collected in the same collection bin (signal stream collection method) appropriately labeled for collecting both aluminum and plastic recyclable products
- Paper recyclable products are collected in a collection bin appropriately labeled for collecting typical office generated paper products to include:
 - Copy paper
 - Paper board
 - Card stock (file folders)
 - Envelopes
 - Phone Books/Catalogs/Magazines
 - Junk mail
 - Blue prints/drawings
 - Newspaper
- Glass recyclable products are collected in a collection bin appropriately labeled for collecting glass recycling products

NOTE: Broken glass must be placed into a small – appropriate sized box and/or be placed into 2 to 3 plastic bags before gently placing the recyclable product into the appropriately labeled recycling bin in order to protect housekeeping staff.
- Ink/toner cartridges and/or tubes are collected in a collection bin appropriately labeled for collecting ink/toner cartridges.
- Cardboard boxes and/or cardboard packing materials must be broken down flat and placed next to the recycling system collection bins.

NOTE: Large amounts of cardboard product must be delivered as denoted above to the mixed recycling product dumpster located near the recycling connex.

The recycling connex is located on the north side of the site centrally near the salt truck gate, North West of Building 247.

Attachment 1 – WIPP Recycling Program Summary and Guidelines:

Products that cannot be recycled in the facilities current market place:

- Bubble wrap
- Foam products (cups/Togo containers)
- Plastic grocery type bags

Requesting a recycling bin for your desk or to suggest a recycling system bin location:

Employees may request a personal desk recycling container by contacting SEC
Recycling system bin location suggestions may be communicated by contacting SEC

Non-traditional Site Generated Recyclable Products:

Non-traditional recyclable products collected and managed on-site include:

Hazardous Waste recyclable products such as batteries:

- Lead Acid
- Lithium
- Lithium-Ion
- NiCad
- Ni-Oxide
- Nickel metal hydride
- Silver-Oxide

Universal Waste recyclable products such as light bulbs:

- Incandescent light bulbs
- Fluorescent light bulbs
- LED light bulbs

Attachment 1 – WIPP Recycling Program Summary and Guidelines:**Special Waste Recyclable Products:**

- Smoke Detectors
- Mercury Switches
- Mercury Thermostats

Non Hazardous Recyclable Waste:

- Tires
- Mixed Media (VHS tapes, cassettes, DVD, RWD etc.)
- Wood (shaft timbers/left over lumber/wooden pallets/wooden crates)
- Mixed Metal products (empty drums, cylinders, aerosol cans)
- Electronic Equipment (HVAC equipment, window AC, refrigerators, microwaves, coffee makers, radios, TVs, computers, monitors, etc.)

CAUTION: Electronic equipment containing refrigerant must be drained of the refrigerant by a NWP designated HVAC technician/contractor capable of capturing the GHS in accordance with local, county, state and federal law.

CAUTION: Electronic equipment/device that contains and/or requires a circuit board, microchip, microprocessor, or electronic computerized component to operate and/or function as designed may need to be removed if applicable for proper recycling and/or disposal.

NOTE: Surplus products found to be in excellent/good/fair operational shape but have been deemed or labeled as no longer fulfilling a purpose at WIPP shall be made available to other federal agencies via the excess list and/or donation in accordance with WIPP property management procedure.

NOTE: It is the work group/manager and/or requesting agent's sole responsibility to initiate and complete the process in its entirety, as determined and/or directed by the applicable property management procedure and/or the P2 program plan expectation.