Mr. John E. Kieling, Bureau Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87508-6303

Ms. Kathryn Roberts, Director
Resource Protection Division
New Mexico Environment Department
Harold Runnels Building
1190 Saint Francis Drive, Room 4050
Santa Fe, NM 87502-5469

Subject: Standard Operating Procedures for the Underground Derived Waste Storage Plan


Dear Mr. Kieling and Ms. Roberts:

The purpose of this letter is to transmit Standard Operating Procedures (SOPs) WP 05-WH1811 Underground Site-Derived Mixed Waste Storage Area Inspections and WP 05-WH1836 Underground Site-Derived Mixed Waste Handling, in accordance with the above-referenced correspondence. These SOPs incorporate comments made by the New Mexico Environment Department (NMED) on the Underground Derived Waste Storage Plan. The SOPs are enclosed in this submittal.

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

If you have any questions, please contact Mr. George T. Basabivelzao at (575) 234-7488.

Sincerely,

Robert L. McQuinn, Project Manager
Nuclear Waste Partnership LLC

Original Signatures on File

José R. Franco, Manager
Carlsbad Field Office

Enclosures (2)

cc: w/enclosures
R. Maestas, NMED *ED
S. Holmes, NMED ED
C. Smith, NMED ED
J. Sales, EPA ED
CBFO M&RC

*ED denotes electronic distribution
Underground Site-Derived Mixed Waste Storage Area Inspections

Technical Procedure

EFFECTIVE DATE: 04/29/15

Craig Suggs
APPROVED FOR USE

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# CHANGE HISTORY SUMMARY

<table>
<thead>
<tr>
<th>REVISION NUMBER</th>
<th>DATE ISSUED</th>
<th>DESCRIPTION OF CHANGES</th>
</tr>
</thead>
<tbody>
<tr>
<td>0</td>
<td>12/02/14</td>
<td>• New document.</td>
</tr>
</tbody>
</table>
| 1               | 04/29/15    | • Deleted in steps 1.1 and 3.2, and in attachments 1 and 2, references to S-700 site-derived storage location.  
• Added step 3.1 regarding notifying RES if inspection cannot be performed once every seven days.  
• Added rows in attachment 1 for Area Ventilation Rate and container inspections.  
• Deleted attachment 3 regarding S-700 site-derived storage location. |
INTRODUCTION

This procedure provides guidance for performing inspections of Underground (U/G) Site-Derived Mixed Waste Storage Areas.

Performance of this procedure generates the following record(s), as applicable. Any records generated are handled in accordance with departmental Records Inventory and Disposition Schedules.

- Attachment 1, Preoperational Underground Site-Derived Mixed Waste Storage Area Inspections
- Attachment 2, Weekly Underground Site-Derived Mixed Waste Storage Area Inspections
- Attachment 3, Waste Volume Tracking Checklist for Site-Derived Storage Area, E-140 between S-2520 and S-2750
- Attachment 4, Waste Volume Tracking Checklist for Site-Derived Storage Area, Panel 7 Room 2

REFERENCES

<table>
<thead>
<tr>
<th>DOCUMENT NUMBER AND TITLE</th>
<th>BASELINE DOCUMENT</th>
<th>REFERENCED DOCUMENT</th>
<th>KEY STEP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Title 40 Code of Federal Regulations (CFR) Part 264, Subpart I, &quot;Use and Management of Containers&quot;</td>
<td>✓</td>
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<td>40 CFR §264.15, &quot;General Inspection Requirements&quot;</td>
<td>✓</td>
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<tr>
<td>40 CFR Part 761, Subpart C, &quot;Marking of PCBs and PCB Items&quot;</td>
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<tr>
<td>DOE/WIPP-07-3372, Waste Isolation Pilot Plant Documented Safety Analysis</td>
<td>✓</td>
<td></td>
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<tr>
<td>DOE/WIPP-07-3373, Waste Isolation Pilot Plant Technical Safety Requirements</td>
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<td>Hazardous Waste Facility Permit, EPA Identification Number NM4890139088-TSDF</td>
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<td>00CD-0001, WIPP Mine Ventilation Plan</td>
<td>✓</td>
<td></td>
<td></td>
</tr>
<tr>
<td>WP 04-AU1007, Underground Openings Inspections</td>
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<td></td>
<td></td>
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<tr>
<td>WP 13-1, Nuclear Waste Partnership LLC Quality Assurance Program Description</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>WP 15-GM1002, Issues Management Processing of WIPP Forms</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>JHA PROD-825, CH Underground Area Inspections</td>
<td>✓</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Underground Derived Waste Storage Plan</td>
<td>✓</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

CONTINUOUS USE
PRECAUTIONS AND LIMITATIONS

- Only personnel qualified as a CH Floor, Yard and Emplacement Technician/CH Waste Handling Technician/Engineer (FY&E/WHT/WHE) or trainees operating under direct supervision of a qualified CH FY&E/WHT/WHE are authorized to perform CH Waste Handling activities specified in this procedure.

PREREQUISITE ACTIONS

1.0 REVIEW previous inspection results for outstanding Action Requests (ARs) and outstanding deficiencies.

2.0 If a required inspection goes delinquent, PERFORM the following:

2.1 Immediately NOTIFY Site Environmental Compliance (SEC) of the delinquent inspection.

2.2 SCHEDULE and complete the inspection.

2.3 DOCUMENT the following in a letter to SEC within five working days:
   - The schedule for inspection
   - The reason(s) why inspection was not performed
   - Any measures taken to offset negative impacts resulting from not performing the inspection
   - Actions to prevent further delinquencies

2.4 WHE, GO TO WP 15-GM1002, and initiate a WIPP Form.

PERFORMANCE

1.0 PREOPERATIONAL UNDERGROUND SITE-DERIVED MIXED WASTE STORAGE AREA INSPECTIONS (ATTACHMENT 1)

1.1 IF personnel are to be working in active Underground Site Derived Waste Storage Areas 1 and/or 2, THEN, at start of shift, INSPECT areas per attachment 1, as follows:

1.1.1 ENTER date and time of inspection in appropriate blocks.
1.1.2 **INSPECT** the applicable item/condition listed on attachment 1 AND enter check (✓) for satisfactory items/conditions, **U** for any unsatisfactory items/conditions, **N/A** for not inspected, **OR** actual value required.

1.1.3 **INITIAL** applicable block.

1.1.4 **IF** any item/condition is unsatisfactory, **THEN PERFORM** the following:

- **DESCRIBE** exact location and nature of deficiency in Remarks section.
- **NOTIFY** WHE.
- **INITIATE** and record AR for corrective action, as applicable.

1.1.5 **ENTER** printed name, signature, and initials on attachment 1 when inspection completed.

1.1.6 **MARK** "N/A" for any unused block on attachment 1.

1.2 **SUBMIT** inspection sheet to Reviewer upon completion of Preoperational Inspection.

2.0 REVIEW

2.1 Reviewer, **PERFORM** the following:

2.1.1 **REVIEW** attachment 1 for unsatisfactory conditions, corrective actions taken, and outstanding or newly generated ARs.

2.1.2 **ENTER** initials in block provided for specific day.

2.1.3 Upon completion of last inspection documented, **FORWARD** attachment 1 to WHE for validation.

CONTINUOUS USE
3.0 WEEKLY SITE- DERIVED MIXED WASTE STORAGE AREA INSPECTIONS  
(ATTACHMENT 2)  

NOTE  
Weekly inspections are not required if waste is not stored in applicable areas or if area is inaccessible.

3.1 IF inspection CANNOT be performed at least once every seven days, THEN NOTIFY, in writing, Regulatory Environmental Services within 24 hours.

3.2 IF waste is stored, in active Underground Site-Derived Waste Storage Areas 1 and/or 2, THEN at least once every seven days or per WHM direction, INSPECT applicable areas per attachment 2 and perform the following:

3.2.1 ENTER date and time of inspection in appropriate blocks.

3.2.2 INSPECT the applicable items/conditions listed on attachment 2 and enter ✓ for satisfactory items/conditions, U for any unsatisfactory items/conditions, N/A for not applicable.

3.2.3 ENTER initials in block provided.

3.2.4 IF any inspection result is NOT satisfactory, THEN PERFORM the following:

• DESCRIBE exact location and nature of deficiency in Remarks section.

• NOTIFY WHE.

• INITIATE and record ARs for corrective action, as applicable.

3.2.5 Inspector, PRINT name, sign, and enter initials when inspection is completed.

3.2.6 SUBMIT inspection sheet to reviewer upon completion of Weekly Inspection.

3.2.7 Reviewer, PROCEED to section 2.0.
4.0 VALIDATION

4.1 WHE, **PERFORM** the following:

4.1.1 Upon completion of last inspection on attachments 1 and 2, **VERIFY** correctness of form. Validate inspection(s) by printing name, signing, and dating inspection sheet in spaces provided.

4.1.2 **REVIEW** attachments 1 and 2 weekly and forward completed attachments to Records Coordinator.

5.0 WASTE VOLUME TRACKING (ATTACHMENTS 3, 4)

5.1 WH, when a new container is placed into an underground Site-Derived Waste Storage Area, **INFORM** WHE of container ID number as it is introduced into the Site Derived Waste Storage Area.

5.2 WHE, **UPDATE** Waste Volume Tracking Checklist (attachments 3 and/or 4), on next available row, with the following:

- **ENTER** initials and date when container was introduced into Site-Derived Waste Storage Area, on Initial/Date block for applicable storage area.
- **ENTER** container ID number in Container ID block.
- **ENTER** container type in Container Type block. (SWB, 55 gallon or 85 gallon drum).

5.3 Performer, **ENTER** printed name, signature, and initials on attachment(s) 3 and/or 4.
## Preoperational U/G Site-Derived Mixed Waste Storage Area Inspection

<table>
<thead>
<tr>
<th>Description</th>
<th>Date</th>
<th>Time</th>
<th>U</th>
</tr>
</thead>
<tbody>
<tr>
<td>U/G Work Area Ground Control Inspection satisfactory in accordance with WP 04-AU1007</td>
<td></td>
<td></td>
<td>U</td>
</tr>
<tr>
<td>No evidence of adverse health/safety conditions</td>
<td></td>
<td></td>
<td>U</td>
</tr>
<tr>
<td>Unobstructed access to exposed face of containers</td>
<td></td>
<td></td>
<td>U</td>
</tr>
<tr>
<td>Area free of debris</td>
<td></td>
<td></td>
<td>U</td>
</tr>
<tr>
<td>No evidence of spills/leaks from containers</td>
<td></td>
<td></td>
<td>U</td>
</tr>
<tr>
<td>Containers in good condition</td>
<td></td>
<td></td>
<td>U</td>
</tr>
<tr>
<td>Containers compatible with waste (drums/SWBs)</td>
<td></td>
<td></td>
<td>U</td>
</tr>
<tr>
<td>Containers are closed</td>
<td></td>
<td></td>
<td>U</td>
</tr>
<tr>
<td>Non-compatible waste is separated from compatible waste</td>
<td></td>
<td></td>
<td>U</td>
</tr>
<tr>
<td>Containers with liquid on containment pallet</td>
<td></td>
<td></td>
<td>U</td>
</tr>
<tr>
<td>Containment pallets in good condition</td>
<td></td>
<td></td>
<td>U</td>
</tr>
<tr>
<td>Adjacent mine pager phones operational</td>
<td></td>
<td></td>
<td>U</td>
</tr>
<tr>
<td>U/G phone system operational</td>
<td></td>
<td></td>
<td>U</td>
</tr>
<tr>
<td>Warning signs posted</td>
<td></td>
<td></td>
<td>U</td>
</tr>
<tr>
<td>PCB warning signs posted (as applicable)</td>
<td></td>
<td></td>
<td>U</td>
</tr>
<tr>
<td>44 - inch minimum aisle space for Site-Derived Waste containers</td>
<td></td>
<td></td>
<td>U</td>
</tr>
<tr>
<td>Site-Derived Location 1 E140 between S-2520 and S-2750</td>
<td></td>
<td></td>
<td>U</td>
</tr>
<tr>
<td>Site-Derived Location 2 Panel 7 Room 2</td>
<td></td>
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<td>U</td>
</tr>
<tr>
<td>PERFORMER INITIALS</td>
<td></td>
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<td></td>
</tr>
<tr>
<td>REVIEWER INITIALS</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

* √ = Satisfactory  U = Unsatisfactory  N/A = Not Inspected

Performers enter Printed Name, Signature, and Initials:
Attachment 1 – Preoperational Underground Site-Derived Mixed Waste Storage Area Inspections

__________________________________________________________________________

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__________________________________________________________________________

Printed Name                Signature                Initials

REMARKS: ________________________________________________________________

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VALIDATION:                  /                                   /                     
                                 WHE (Print Name)               Signature               Date
### WEEKLY U/G SITE-DERIVED MIXED WASTE STORAGE AREA INSPECTION

<table>
<thead>
<tr>
<th>ITEM</th>
<th>DATE</th>
<th>TIME</th>
</tr>
</thead>
<tbody>
<tr>
<td>U/G Work Area Ground Control Inspection satisfactory in accordance with WP 04-AU1007</td>
<td>✓/U*</td>
<td>✓/U*</td>
</tr>
<tr>
<td>No evidence of adverse health/safety conditions</td>
<td>✓/U*</td>
<td>✓/U*</td>
</tr>
<tr>
<td>Unobstructed access to exposed face of containers</td>
<td>✓/U*</td>
<td>✓/U*</td>
</tr>
<tr>
<td>Area free of debris</td>
<td>✓/U*</td>
<td>✓/U*</td>
</tr>
<tr>
<td>No evidence of spills/leaks from containers</td>
<td>✓/U*</td>
<td>✓/U*</td>
</tr>
<tr>
<td>Adjacent mine pager phones operational</td>
<td>✓/U*</td>
<td>✓/U*</td>
</tr>
<tr>
<td>U/G phone system operational</td>
<td>✓/U*</td>
<td>✓/U*</td>
</tr>
<tr>
<td>Warning signs posted</td>
<td>✓/U*</td>
<td>✓/U*</td>
</tr>
<tr>
<td>PCB warning signs posted (as applicable)</td>
<td>✓/U*</td>
<td>✓/U*</td>
</tr>
<tr>
<td>44 - inch minimum aisle space for Site-Derived Waste containers</td>
<td>✓/U*</td>
<td>✓/U*</td>
</tr>
<tr>
<td>Site-Derived Location 1  E140 between S-2520 and S-2750</td>
<td>✓/U*</td>
<td>✓/U*</td>
</tr>
<tr>
<td>Site-Derived Location 2  Panel 7 Room 2</td>
<td>✓/U*</td>
<td>✓/U*</td>
</tr>
</tbody>
</table>

**PERFORMER INITIALS**  xxxxxxx

**REVIEWER INITIALS**  xxxxxxx

* ✓ = Satisfactory  U = Unsatisfactory  N/A = Not Inspected

Performers enter Printed Name, Signature, and Initials:

---

Printed Name  Signature  Initials

CONTINUOUS USE
Attachment 2 – Weekly Underground Site-Derived Mixed Waste Storage Area Inspections

REMARKS: ____________________________________________________________

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VALIDATION: _______________________________________________________

 WHE (Print Name)          Signature          Date
Attachment 3 – Waste Volume Tracking Checklist for Site-Derived Storage Area, E-140 between S-2520 and S-2750

**Waste Volume Tracking**

<table>
<thead>
<tr>
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<th>CONTAINER TYPE</th>
</tr>
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<tbody>
<tr>
<td></td>
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</tbody>
</table>

**Total waste volume**
## Container Type and Volume Reference Guide

<table>
<thead>
<tr>
<th>Container Type</th>
<th>Container Volume</th>
</tr>
</thead>
<tbody>
<tr>
<td>55-Gallon Drum</td>
<td>0.21 m³</td>
</tr>
<tr>
<td>85-Gallon Drum</td>
<td>0.32 m³</td>
</tr>
<tr>
<td>Standard Waste Box (SWB)</td>
<td>1.88 m³</td>
</tr>
</tbody>
</table>

Performer’s Name (print)  Signature  Initials

REMARKS: _________________________

VALIDATION: ________________________  WHE Name (print)  Signature  Date

CONTINUOUS USE
**Waste Volume Tracking**

<table>
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<th>CONTAINER TYPE</th>
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</tbody>
</table>

**Total waste volume**
Attachment 4 – Waste Volume Tracking Checklist for Site-Derived Storage Area, Panel 7 Room 2

# Container Type and Volume Reference Guide

<table>
<thead>
<tr>
<th>Container Type</th>
<th>Container Volume</th>
</tr>
</thead>
<tbody>
<tr>
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</tr>
<tr>
<td>Standard Waste Box (SWB)</td>
<td>1.88 m³</td>
</tr>
</tbody>
</table>

Performer's Name (print)  Signature  Initials

REMARKS:

VALIDATION:  
WHE Name (print)  Signature  Date

CONTINUOUS USE
WP 05-WH1836

Revision 1

Underground Site-Derived Mixed Waste Handling

Technical Procedure

EFFECTIVE DATE: 05/18/15

Craig Suggs
APPROVED FOR USE

WORKING COPY VERIFICATION

Revision Checked: 
Page count: 
Name: 
Signature: 
Date and Time: 

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<tr>
<td>0</td>
<td>12/02/14</td>
<td>• New document.</td>
</tr>
</tbody>
</table>
| 1               | 05/18/15    | • Minor changes throughout for clarity/consistency.  
|                 |             | • Added Precautions bullet for container placement. |
|                 |             | • Deleted step 4.18 and last bullet of step 4.23 regarding recording waste description. |
|                 |             | • Moved step 4.34 to step 4.31. |
|                 |             | • Added new steps 7.1 and 7.5. |
INTRODUCTION

This procedure provides instructions for managing underground site-derived transuranic (TRU) waste (liquid and/or solid) at the Waste Isolation Pilot Plant (WIPP). Entry into this procedure is as described in Hazardous Waste Facility Permit (the Permit) Attachment A, section A-5, which states that the resulting waste that may be classified as underground site-derived waste. Underground site-derived waste may include, but is not limited to, the following materials contaminated with TRU Waste characterized for disposal at WIPP in accordance with the Waste Analysis Plan (WAP).

- Decontaminating liquids
- Water
- Salt
- High-Efficiency Particulate Air (HEPA) filters
- Swipes
- Protective Clothing (PC) and Personal Protective Equipment (PPE)
- Soil
- Wastes from spill response, sampling and decontamination activities
- Rags, wipes

If the underground site-derived waste has been determined to be from a waste stream containing Polychlorinated Biphenyls (PCBs), refer to the Underground Derived Waste Storage Plan for regulatory notifications and compliance with the Polychlorinated Biphenyls Condition of Approval waste storage areas requirements.

Performance of this procedure generates the following record(s), as applicable. Any records generated are handled in accordance with departmental Records Inventory and Disposition Schedules.

- Container Data Report
- Copy of “emplacement complete” notification email
- Attachment 1, Waste Container Log Sheet
- Attachment 2, Underground Site-Derived Waste Criteria Compliance Tag
- Attachment 3, WDS/WWIS Input Data Sheet, Underground Site-Derived Waste

REFERENCES

<table>
<thead>
<tr>
<th>DOCUMENT NUMBER AND TITLE</th>
<th>BASELINE DOCUMENT</th>
<th>REFERENCED DOCUMENT</th>
<th>KEY STEP</th>
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REFERENCE USE
## REFERENCES

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<tr>
<td>DOE/WIPP-02-3122, Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant</td>
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<td>DOE/WIPP-07-3372, Waste Isolation Pilot Plant Documented Safety Analysis</td>
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<td>DOE/WIPP-07-3373, Waste Isolation Pilot Plant Technical Safety Requirements</td>
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<tr>
<td>Underground Derived Waste Storage Plan</td>
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EQUIPMENT

- For Waste Collection:
  - Containers that meet U.S. Department of Transportation (DOT) Type 7A, or equivalent, packaging requirements may be used for underground site-derived waste collection. Container types and equipment used for the collection of derived waste are:
    - 55-gallon drums
    - 85-gallon drums
    - Standard Waste Boxes (SWBs)
    - Drum and SWB filters that meet the applicable acceptance criteria and specifications of DOE/WIPP-02-3122
    - Poly liners/bags
    - Tape
    - Bench scale (as needed)
    - Floor scale (as needed)
    - Permanent marker
    - In-line load cell (as needed)
    - Sockets and wrenches for drums
    - Allen head sockets for SWB
    - Ratchet
    - Torque wrenches (as needed)
    - Calculator

- For Solidification:
  - PPE as per Industrial Safety/Industrial Hygiene (IS/IH)
  - Measure of acidity and alkalinity (pH) meter with pH seven buffer or litmus paper
— Trisodium phosphate and monosodium phosphate (for pH control)
— 150 to 300 lb AQUASET/drum
— Stirrer paddle
— Bags/Tape

PRECAUTIONS AND LIMITATIONS

• Liquids shall be collected and solidified in 55/85-gallon drums.

• If stored, underground site-derived waste containers shall be stored on spill tray, or equivalent.

• Only personnel qualified as Waste Handling Technician/Engineer/Radiological Control Technician (WHT/WHE/RCT), or trainees operating under direct supervision of qualified WHT/WHE/RCT, are authorized to perform waste handling activities specified in this procedure.

• Abnormal events that require cessation of this procedure are to be performed in accordance with WP 12-HP4000 and WP 05-WH4401.

• All containers used for storing underground site-derived waste must be new.

• Containers storing underground site-derived waste must be kept closed except when adding, removing, or sampling waste.

• All weight measurements must be recorded in kilograms (kg).

• Radiological Work Permits (RWPs) and other administrative controls provide protective measures to help ensure new hazardous constituents will not be added during decontamination activities. Site Environmental Compliance (SEC) must be consulted to ensure hazardous waste numbers are appropriately applied to the derived waste.

• Radiological control personnel and the WHE shall be contacted prior to opening an underground site-derived waste collection container for adding, removing, or sampling waste.

• Each drum must have at least one filter installed. Each SWB must have at least two filters installed, and vacant ports must be plugged, per DOE/WIPP-02-3122.

• Shielding MUST NOT be used to meet the 200 millirem per hour (mR/h) limit.
• The following radiological values **MUST NOT** be exceeded:

  — Contact dose rate of 200 mR/h at any point on underground site-derived waste containers.

  — 20 disintegrations per minute (dpm)/100 cm\(^2\) alpha loose surface contamination on exterior of waste container.

  — 200 dpm/100 cm\(^2\) beta/gamma loose surface contamination on exterior of waste container.

• A gross weight of 1,000 lb (454 kg) per 55/85-gallon drum **MUST NOT** be exceeded.

• A gross weight of 4,000 lb (1,814 kg) per SWB **MUST NOT** be exceeded.

• Fire extinguisher charging cartridges will be removed, **OR** verified fully discharged and clearly punctured, prior to inclusion in underground site-derived mixed waste.

• The following items are prohibited in underground site-derived waste containers destined for emplacement underground:

  — Compressed gasses

  — Corrosives

  — Explosives

  — Ignitable and Reactive Waste

  — Pyrophorics

  — Pressurized containers

  — Free liquids

  — Noncompatible materials

  — Hazardous waste having U. S. Environmental Protection Agency (EPA) hazardous waste numbers other than those listed in Part A of the Permit

• If the cumulative Pu-239 FGE of the combined original waste containers exceeds 200 grams, Nuclear Safety must be contacted.

• Liquid transfer shall not exceed 40 gallons per 55-gallon drum.
• Liquid transfer shall not exceed 60 gallons per 85-gallon drum.

• Under no circumstances should containers be left open while personnel are not present.

• Efforts shall be taken to reduce the amount and toxicity (e.g., efforts to minimize the introduction of additional hazardous substances) of underground site-derived waste that is generated.

• All N/As (Not Applicable) on attachments 1, 2, and 3 must be initialed by the person performing the step.

• Containers can only be placed one-high in approved underground site-derived storage locations.

PREREQUISITE ACTIONS

NOTE

If upon inspection, a derived waste container is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, transfer the waste to a container in good condition, overpack the container, or repair/patch the container in accordance with the Permit, Attachment A2.

1.0 WHE, OBTAIN RWP prior to handling (pumping, pouring, transferring, etc.) radiologically contaminated waste.

2.0 WHE, VERIFY adequate waste handling operations staff and others from organizations designated to support planned activities as specified in the procedure.

3.0 WHE, ENSURE the underground site-derived waste storage area inspections have been completed per WP 05-WH1811, as needed.
PERFORMANCE

NOTE
Sections of this procedure do not have to be performed in the order written if deemed necessary by WHE. Attachments are required to be completed as the applicable step is completed.

1.0 UNDERGROUND SITE-DERIVED WASTE CONTAINER PREPARATION

NOTE
Adequate aisle space for passage of emergency equipment, emergency response actions, and/or container inspections must be maintained when placing containers in site-derived waste storage area (44 inches minimum).

1.1 PREPARE waste containers as follows:

1.1.1 STAGE approved waste containers on spill tray, or equivalent, in designated underground site-derived storage location(s).

1.1.2 REMOVE lid from container.

1.1.3 LINE waste container with poly bag to bottom and extending beyond top of container and record liner type (poly bag AND/OR rigid liner) on attachment 3.

1.1.4 FOLD bag back over top of receptacle and down the outside.

1.1.5 N/A shipment number on attachments 1, 2, and 3.

1.1.6 N/A Container ID (as received) on attachments 1, 2, and 3.

1.1.7 WHE, ASSIGN Waste Data System/WIPP Waste Information System (WDS/WWIS) waste container ID number by appending "WI" (the two-digit ID code for WIPP) and "SD" (the two-digit ID code for site-derived) to next sequential number from the WDS, and record on “Container ID (to be emplaced)” or “WIPP Site ID” line on attachments 1, 2, and 3.
NOTE
More than one Waste Stream Profile (WSPF) number may be applied to the site-derived waste container.

1.1.8 If necessary, WHE, CONTACT WDS Data Administrator and SEC to create new WSPF number(s), for derived waste containers in the WDS, record new waste stream profile number(s), hazardous waste numbers, on attachments 1, 2, and 3.

1.1.9 ENSURE appropriate plug(s) are removed prior to installing filters.

1.1.10 VENT underground site-derived waste container using appropriate filters.

1.1.11 RECORD Torque Wrench serial number and calibration due date on attachment 1.

1.1.12 TORQUE filter(s) to 10 ft-lb (± 5 ft-lb).

1.1.13 RECORD filter model number(s) and serial number(s) on attachment 3.

1.1.14 RECORD filter(s) installation date on attachment 3.

1.1.15 Using the values from Table 1 below, ENTER empty container weight (kg) as the tare weight on attachment 3.

<table>
<thead>
<tr>
<th>Type Code</th>
<th>Description</th>
<th>CNTR WGT (kg)</th>
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<tbody>
<tr>
<td>1</td>
<td>55 Gallon Drum</td>
<td>28.6</td>
</tr>
<tr>
<td>2</td>
<td>SWB</td>
<td>290</td>
</tr>
<tr>
<td>21</td>
<td>85 Gallon Drum Tall</td>
<td>37.0</td>
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</table>

1.1.16 RCT, OBTAIN and RECORD radiological survey number on attachment 2.

1.1.17 IF collecting solid waste, GO TO section 2.0.

OR

IF collecting liquid waste, GO TO section 3.0.
2.0 UNDERGROUND SITE- DERIVED WASTE ITEM INSPECTION AND CONTAINERIZATION

WARNING

To prevent unnecessary exposure to radioactive, and/or hazardous materials, a sealed bag or container MUST NOT be opened for inspection unless there is reason to believe it contains prohibited items or contents cannot be otherwise identified.

NOTE

The lid to the underground site-derived waste container may be installed and removed, as necessary, for adding, removing, or sampling waste.

Waste is typically placed in bags during cleanup or decontamination of an area and then placed in site-derived waste containers.

2.1 If necessary, **RELOCATE** the underground site-derived container to work location.

2.2 **INSPECT** all items delivered to waste container, and ensure absence of prohibited items.

2.3 IF prohibited items are identified upon inspection, **THEN ISOLATE** and notify Site Environmental Compliance.

2.4 **RECORD** the following on the applicable attachment:

- ENTER N/A for Origin, attachment 1.
- DOCUMENT the CONTENTS of the bagged material as it is placed in the derived waste container, attachment 1. (e.g., anti-c clothing, leather gloves, rags, duct tape, brattice cloth)
NOTE
The sum of the figures provided for documenting waste material parameters are estimates only and should equal the gross bag weight (e.g., 5 kg of cellulosics, 2 kg of rubber, 3 kg of plastics equal 10 kg gross bag weight) on attachment 3.

2.5 ESTIMATE the weight of each type of waste material parameter in each bag before placing the bag into the waste container.

2.6 WEIGH each bag containing waste materials on a calibrated scale and record the weight on “Individual Bag Weights” line on attachment 1 (if applicable).

2.7 RCT, ENSURE appropriate radiological labeling is affixed to exterior of waste container.

2.8 PLACE waste bag into waste container.

NOTE
Waste containers are only sealed after being placed in approved underground site-derived storage location.

2.9 WHEN waste container is to be sealed, THEN WHE, ENSURE the following:

- Container does not contain free liquids.
- If waste does contain free liquids, GO TO section 3.0 before proceeding.

2.10 FOLD-AND-TAPE or twist-and-tape (J-seal) inner plastic bag.

2.11 WHE, ESTIMATE volume of waste material (fill factor) in drum and record on attachment 3 (e.g., 20%, 30%, 95%).
2.12 **SECURE** lid on container.

- For a drum:
  - If container is outside of a site-derived storage area, **TIGHTEN** retaining bolt to approximately 40 ft lbs.
  - If container is in a site-derived storage area, **TIGHTEN** retaining bolt to approximately 20 ft lbs.
- For an SWB, **ENSURE** lid is in place and install four bolts hand tight.

2.13 **RCT**, **PERFORM** contamination and dose rate surveys of waste container exterior and record results on attachment 2.

**SIGN-OFF** RCT, attachment 2

2.14 **GO TO** section 5.0.

3.0 **LIQUID WASTE COLLECTION**

3.1 **GO TO** section 1.0 for waste container preparation, and **RETURN TO** step 3.2.

3.2 If required to reduce the amount of material handling, **RELOCATE** underground site-derived waste container to the work location.

**NOTE**

The lid to the underground site-derived waste container may be installed and removed, as necessary, for adding, removing, or sampling waste.

3.3 For small volumes of liquid, **PERFORM** the following:

3.3.1 **SPREAD** absorbent pellets, pads, pigs, or other absorbent material over liquid to absorb all liquid present.

3.3.2 **ALLOW** 30 minutes for liquid to be absorbed.

3.3.3 If necessary, **REAPPLY** additional absorbent over liquid until no free-standing liquid is present.

3.3.4 **SHOVEL** (or scoop) material and transfer to solid waste poly bag using flat shovel or scoop.

3.3.5 **WIPE** surfaces with absorbent pads.
3.3.6 **PLACE** used pads in solid waste poly bag.

3.3.7 **CLOSE** bag by fold-and-seal or twist-and-tape (J-seal) method.

3.4 If using pump for large volume of liquid, **PERFORM** the following:

3.4.1 **RECORD** the following on attachment 1:

- N/A gross weight of bagged material
- Origin (source of waste)
- Description of liquid waste in contents section
- Hazardous waste numbers (Site Environmental Compliance will provide)

3.4.2 **TRANSFER** liquid to liquid waste containers.

[ A ] Ensuring that liquid transfer does not exceed 40 gallons per 55-gallon drum (approximately 24 inches from bottom).

[ B ] Ensuring that liquid transfer does not exceed 60 gallons per 85-gallon drum (approximately 27 inches from bottom).

3.4.3 **WIPE** surface with absorbent pads.

3.4.4 **PLACE** used pads in solid waste poly bag.

3.4.5 **CLOSE** bag by fold-and-seal or twist-and-tape (J-seal) method.

3.5 **GO TO** section 2.0 for underground site-derived waste item inspection and containerization, **AND RETURN TO** section 4.0, as applicable.

**NOTE**
It may be necessary to stir contents with a stir stick after adding AQUASET to ensure adequate absorption.

4.0 **SOLIDIFICATION OF LIQUID WASTE**

4.1 For liquid levels:

- **ENSURE** 55 gallon drum contents **DO NOT** exceed 40 gallons (24 inches from bottom) of liquid.

REFERENCE USE
• **ENSURE** 85 gallon drum contents **DO NOT** exceed 60 gallons (27 inches from bottom) of liquid.

4.2 **CONTACT** IS/IH to determine pH using pH meter or litmus paper and record on attachment 1 as initial pH level.

4.3 **OBTAIN** neutralization instructions and compatibility information from IS/IH.

4.4 If pH is greater than 2.0 and less than 5.0, **ADD** about 1/4 teaspoon of trisodium phosphate and stir liquid.

4.5 If pH is greater than 9.0 and less than 12.5, **ADD** about 1/4 teaspoon of monosodium phosphate and stir liquid.

4.6 **REPEAT** step 4.4 or step 4.5 until pH is between 5.0 and 9.0.

4.7 **WHEN** pH is between 5.0 and 9.0, **THEN WIPE** contaminated stirrer as it is removed from drum.

4.8 **PLACE** used litmus paper, stirrer, and absorbent pad in solid waste poly bag for disposition.

4.9 If liquid is present in solid waste bag, **ADD** one part AQUASET to three parts standing liquids.

4.10 **CLOSE** solid waste bag by fold-and-seal or twist-and-tape (J-seal) method.

4.11 **RECORD** pH level on attachment 1 at pH after neutralization.

4.12 **SPREAD** entire contents of a 50 lb bag of AQUASET over surface of liquid as evenly as possible.

4.13 **PLACE** empty AQUASET bag into a solid waste container or solid waste bag.

4.14 **WAIT** approximately 30 minutes.

4.15 **REPEAT** steps 4.12 and 4.13 two more times for a 55-gallon drum and four more times for an 85-gallon drum.

4.16 **PLACE** lid on drum and secure with drum ring.

4.17 **TIGHTEN** retaining bolt to the appropriate torque:
• If container is outside of a site-derived storage area, tighten retaining bolt to approximately 40 ft lbs.

• If container is in a site-derived storage area, tighten retaining bolt to approximately 20 ft lbs.

4.18 **LET** stand for more than 24 hours.

4.19 **REMOVE** lid and inspect surface for any free-standing liquid.

4.20 If any free-standing liquid remains, **ADD** one part AQUASET to three parts standing water, by volume, to complete solidification process.

4.21 **WHE,** **ENSURE** there are no free liquids in container.

4.22 **CLOSE** bag by fold-and-seal or twist-and-tape (J-seal) method.

4.23 **WHE,** **PERFORM** the following for solidification of liquid waste:

• **RECORD** on attachment 1 date waste was solidified (date no more absorbent is required).

• **ESTIMATE** volume of waste material (fill factor) in drum and record on attachment 3 (e.g., 20%, 30%, 95%).

4.24 **PLACE** lid on drum and seal drum ring, as per step 7.3.

**SIGN-OFF WHE,** attachment 2

4.25 **RCT,** **PERFORM** contamination and dose rate surveys of waste container exterior and record results on attachment 2.

**SIGN-OFF RCT,** attachment 2

4.26 **RCT,** **ENSURE** appropriate radiological labeling is affixed to exterior of waste container.

4.27 **RECORD** the following on attachment 3:

• Waste Type Code
• Handling Code
• Container Type Code
• Liner Type (poly bag **AND/OR** rigid liner)

4.28 **WEIGH** sealed waste container.

4.29 **RECORD** gross weight on waste container and on attachment 3.
4.30 **SUBTRACT** tare weight from the gross weight of waste container or attachment 3 and record as waste weight on attachment 3.

4.31 **ENSURE** applicable steps for preoperational inspections per WP 05-WH1811 have been completed.

4.32 If waste container was moved to the work site, **MOVE** the waste container to the Underground Site-Derived Waste Storage Area.

4.33 **GO TO** section 2.0 for underground site-derived waste item inspection and containerization, if applicable.

**SIGN-OFF WHE, attachment 2**

5.0 **CONTAINER IDENTIFICATION REQUIREMENTS**

5.1 **RECORD** the following on attachment 3:

- Waste Type Code
- Handling Code
- Container Type Code

5.2 **WEIGH** sealed waste container.

5.3 **RECORD** gross weight (kg) of waste container on attachment 1.

5.4 **SUBTRACT** tare weight (kg) marked on waste container and/or attachment 3 from gross weight of waste container and record as waste weight on attachment 3.

5.5 **IF** waste container contains no liquid wastes, **THEN N/A** the following on attachment 1:

- Initial pH Level
- pH level after neutralization
- Date liquid waste solidified

**NOTE**

Bar code labels may be transmitted from the Data Administrator (DA) to the WHE via email.

5.6 **WHE, REFER TO** WP 05-WH.02 to create bar code labels.
5.7 WHE, PRINT the labels and apply container WDS/WWIS ID number bar code labels, or hand-write container ID numbers as follows:
   - Drums - place three labels on side, near bottom, and spaced about 120 degrees apart.
   - SWBs - place labels on flat sides near top.

5.8 WHE, OBTAIN and APPLY hazardous material/waste decals on container(s), if applicable.

6.0 COMPLETION OF RECORD PACKAGE

6.1 All performers responsible for step completion on attachments 1 and 2, ENTER printed name, signature, initials, and date on applicable attachments.

6.2 COMBINE attachments 1, 2, and 3 to form record package.

---

**NOTE**

A container should be sealed when no more waste, as determined by WHE or WHM, will be placed in the container.

Containers must be placed in an approved storage location within 72 hours of being filled.

Containers that are sealed in section 7.0 will remain in temporary approved storage location(s) until approved for disposal in waste panels or shipped off-site as low-level waste.

---

7.0 SEALING CONTAINERS

7.1 WHE, **IF** no more waste will be put in a container, **THEN ENSURE** container is stored in or is relocated to an approved underground site-derived storage location.

   7.1.1 **IF** an approved storage location is NOT accessible for placement of container within 72 hours, **THEN DOCUMENT** reason in comment section of attachment 1.

7.2 RECORD torque wrench number and calibration due date on attachment 1.

7.3 For drums:

   7.3.1 **ENSURE** lock ring is on drum.
7.3.2 **ENSURE** retaining bolt is installed and torque to 55-60 ft lbs.

7.4 For SWBs:

7.4.1 **ENSURE** lid is on SWB.

7.4.2 **INSTALL** and **TORQUE** all bolts per WP 08-PT.01.

7.5 **RECORD** date and time container was sealed on attachment 1.

8.0 **VERIFICATION OF RECORD PACKAGE**

8.1 WHE, **REVIEW** attachments 1, 2, and 3 for completion.

8.2 WHE, **ENSURE** container is properly labeled (bar code, hazardous waste, radiological).

8.3 WHE, **ENTER** printed name, signature, and date on attachments 1, 2, and 3.

8.4 Waste Handling Manager (WHM), **PERFORM** the following:

8.4.1 **VERIFY** waste meets waste form and packaging requirements.

8.4.2 **ENTER** printed name, signature, and date on attachments 1, 2, and 3.

8.4.3 **SCAN** the record package to a .pdf file and forward a copy of the record package via email to WDS/WWIS DA and Regulatory Environmental Services (RES) Point of Contact (POC).

8.5 WDS/WWIS DA, **PERFORM** the following:

**NOTE**

The completeness check will verify that all waste streams associated with the original waste container are recorded on attachments 2 and 3.

8.5.1 Using the WDS Test Instance, **USE** the information provided by Waste Handling to create a new waste stream profile to facilitate successful container data entry and to perform a completeness check of data on all attachments.

8.5.2 If the data on the attachments have missing or incomplete information or if container data cannot be successfully inserted into the WDS, **CONTACT** the WHM.
The WDS data comparison will verify that data is sufficient for successful submittal to the database. The data comparison will verify that ALL hazardous waste numbers assigned to the original waste container will be assigned to the underground site-derived waste container when the data are entered into the WDS production instance.

**8.5.3** PERFORM a data comparison of WP 05-WH1836 criteria with the information that was recorded on each attachment.

**8.5.4** If issues are identified during the data comparison, CONTACT the WHM via email.

**8.5.5** If no issues are identified or issues are adequately addressed during the data comparison, NOTIFY the RES Manager via email that data comparison is complete.

**NOTE**
Container data for underground site-derived waste does not undergo the automated edit/limit checks. Data verification by RES will include an evaluation that the container meets the WIPP Waste Acceptance Criteria and Hazardous Waste Facility Permit requirements. Prior to notification to the data base administrator (DBA) to input the container data to the WDS production instance, data verification by RES and notification to WHM is required.

**8.6** DA, INPUT container data in the WDS production instance and notify the DBA.

**8.7** DBA, NOTIFY DA and WHM and RES manager when container data is available for emplacement.

**8.8** DA, GENERATE a Container Data Report for the waste container and forward to WHM and RES Manager or designee via email.

**8.9** WHE, PRINT a copy of the Container Data Report from the WDS/WWIS dashboard.

**8.10** WHE, FORWARD attachments 1, 2, and 3 and WDS/WWIS Container Data Report to Waste Handling Records Coordinator.

**8.11** WHE, COORDINATE with DBA to electronically emplace container in the WDS.
# WASTE CONTAINER LOG SHEET

| Shipment Number | Container ID (as received) | Container ID (to be emplaced) | Waste Stream Profile (WSPF) # | Gross Weight of Bagged Material (if applicable) | Individual Bag Weights | Origin | Contents | Hazardous Waste Numbers (if applicable) | Initial pH Level (if applicable) | pH Level After Neutralization (if applicable) | Date Liquid Waste Solidified (if applicable) | Container Filter Torque Wrench Serial Number/Calibration Due Date | Container Locking Ring Bolt/Lid Bolts Torque Wrench Serial Number/Calibration Due Date | Date/Time Container was Sealed | Comments |
|-----------------|---------------------------|-------------------------------|--------------------------------|-----------------------------------------------|------------------------|--------|----------|----------------------------------------|-------------------------------|-----------------------------------------------|-----------------------------------------------|-----------------------------------------------|-------------------------------------------------|----------------------------------------------------------|

Performers responsible for each step completion, enter printed name, signature, initials, and date below:

<table>
<thead>
<tr>
<th>Print Name</th>
<th>Signature</th>
<th>Initials</th>
<th>Date</th>
</tr>
</thead>
</table>

**REVIEW**

WHE (Print Name) | Signature | Date |

**VALIDATION**

WHM (Print Name) | Signature |
Attachment 2 – Underground Site-Derived Waste Criteria Compliance Tag

<table>
<thead>
<tr>
<th>WIPP UNDERGROUND SITE- DERIVED WASTE CRITERIA COMPLIANCE TAG</th>
<th>Page ___ of ___</th>
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<tr>
<td>Shipment Number <em>(1.1.5)</em>:</td>
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<tr>
<td>Container ID (as received) <em>(1.1.6)</em>:</td>
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<tr>
<td>Container ID (to be emplaced) <em>(1.1.7)</em>:</td>
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<td>WSPF # <em>(1.1.8)</em>:</td>
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<tr>
<td>Radiological Survey Number <em>(1.1.10)</em>:</td>
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</tbody>
</table>

| Date Sealed:                                                | CONTAINS NO PROHIBITED MATERIAL |

<table>
<thead>
<tr>
<th>WHE (Print Name)</th>
<th>Signature</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>MAXIMUM CONTACT DOSE RATE</td>
<td>MAXIMUM SURFACE REMOVABLE CONTAMINATION</td>
<td></td>
</tr>
<tr>
<td>β-γ</td>
<td>mR/h</td>
<td>a</td>
</tr>
<tr>
<td>η</td>
<td>mR/h</td>
<td>β-γ</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>RCT (Printed Name)</th>
<th>Signature</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Performers responsible for each step completion enter printed name, signature, initials, and date below:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Print Name</th>
<th>Signature</th>
<th>Initials</th>
<th>Date</th>
</tr>
</thead>
</table>

| REVIEW: |

<table>
<thead>
<tr>
<th>WHE (Print Name)</th>
<th>Signature</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>VALIDATION</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>WHM (Print Name)</th>
<th>Signature</th>
<th>Date</th>
</tr>
</thead>
</table>
## Attachment 3 – WDS/WWIS Input Data Sheet, Site-Derived Waste

<table>
<thead>
<tr>
<th>WDS/WWIS INPUT DATA SHEET, UNDERGROUND SITE-DERIVED WASTE</th>
<th>Page ___ of ___</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>FIELDS APPLICABLE TO DERIVED WASTE</strong></td>
<td></td>
</tr>
</tbody>
</table>

**Shipment Number**\(^{(1.1.5)}\)  
**Container ID**\(^{(1.1.6)}\)  
**WIPP Site ID**\(^{(1.1.7)}\)  
**WSPF Number**\(^{(1.1.8)}\)  
**Filter Model Number**  
**Serial Number**\(^{(1.1.13)}\)  
**Filter Installation Date**\(^{(1.1.14)}\)  
**Fill Factor**\(^{(2.11, 4.23)}\)  
**Date Sealed**  
**Waste Type Code**\(^{(4.27, 5.1)}\)  
**Handling Code**\(^{(4.27, 5.1)}\)  
**Container Type Code**\(^{(4.27, 5.1)}\)  
**Liner Type**\(^{(1.1.3, 4.27)}\)  
**Gross Weight**\(^{(4.29)}\)  
**Tare Weight**\(^{(1.1.15)}\)  
**Waste Weight**\(^{(4.30)}\)

- **Data will be input to waste container comments in the WDS/WWIS**
- **WI Data will be input to CNTR-NUM in the WDS/WWIS**
- **Vendor model/serial number of filter(s) used to vent container**
- **Date filter was installed in waste container**
- **Estimated percentage of waste container volume occupied by the waste**
- **Date waste container was closed**
- **Code is "TRU" for nonmixed waste and "MTRU" for mixed waste**
- **Code is "CH" for contact-handled TRU waste**
- **3-digit container type code:**
  - 1 - 55-gallon drum;
  - 2 – SWB;
  - 21 – 85-gallon drum
- **Identifies type of container liner, if applicable**
- **Gross Weight of a container**
- **Tare Weight of empty container**
- **Weight of waste inside container**
### List of Material Parameters

<table>
<thead>
<tr>
<th>WDS/WWIS Data Entry Code</th>
<th>Waste Material Parameter</th>
<th>Material Parameter Weight (kg)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Iron-based metals/alloys</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Aluminum-based metals/alloys</td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>Other metals</td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>Other inorganic materials</td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>Cellulosics</td>
<td></td>
</tr>
<tr>
<td>6</td>
<td>Rubber</td>
<td></td>
</tr>
<tr>
<td>7</td>
<td>Plastic</td>
<td></td>
</tr>
<tr>
<td>8</td>
<td>Inorganic matrix</td>
<td></td>
</tr>
<tr>
<td>9</td>
<td>Organic matrix</td>
<td></td>
</tr>
<tr>
<td>10</td>
<td>Soils/gravel</td>
<td></td>
</tr>
<tr>
<td>11</td>
<td>Steel (packaging materials)</td>
<td></td>
</tr>
<tr>
<td>12</td>
<td>Plastics (packaging materials)</td>
<td></td>
</tr>
<tr>
<td>13</td>
<td>Cellulosic packaging material</td>
<td></td>
</tr>
<tr>
<td>14</td>
<td>Magnesium oxide</td>
<td></td>
</tr>
<tr>
<td>15</td>
<td>Steel emplacement material</td>
<td></td>
</tr>
<tr>
<td>16</td>
<td>Cellulosic emplacement material</td>
<td></td>
</tr>
<tr>
<td>17</td>
<td>Rubber emplacement material</td>
<td></td>
</tr>
<tr>
<td>18</td>
<td>Plastic emplacement material</td>
<td></td>
</tr>
</tbody>
</table>

### Description of Solidified Waste

<table>
<thead>
<tr>
<th>Description of Solidified Waste</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

**REVIEW**

WHE (Print Name) \| Signature \| Date

**VALIDATION**

WHM (Print Name) \| Signature \| Date

REFERENCE USE